

# Exhibit 7

# Exhibit 7

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 1

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 \* \* \* \* \*

4 LATIA ALEXANDER, )  
individually as heir of )  
5 ISAIAH T. WILLIAMS and in )  
her capacity as special )  
6 administrator of the Estate )  
of ISAIAH T. WILLIAMS, )  
7 )  
Plaintiff, )

8 )  
vs. )

9 ) CASE NO. 2:24-cv-00074-APG-NJK

10 LAS VEGAS METROPOLITAN )  
POLICE DEPARTMENT, a )  
political subdivision of )  
11 the State of Nevada; KERRY )  
KUBLA, in his individual )  
12 capacity, et al., )  
13 )  
Defendants. )

14

15 VIDEOTAPED DEPOSITION OF

16 RUSSELL BACKMAN

17 Taken on October 3, 2024

18 at 1:10 p.m.

19 By a Certified Court Reporter

20 Las Vegas, Nevada

21

22

23 Stenographically reported by:  
Heidi K. Konsten, NV CCR 845, RPR  
24 JOB NO. 57948 - Firm No. 116F

25

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 2

1 Videotaped deposition of RUSSELL BACKMAN,  
2 Volume I, stenographically taken at 400 South  
3 Seventh Street, Suite 300, Las Vegas, Nevada, on  
4 Thursday, October 3, 2024, at 1:10 p.m., before  
5 Heidi K. Konsten, Certified Court Reporter in and  
6 for the State of Nevada.

7

8 APPEARANCES OF COUNSEL

9 For the Plaintiff:

10 CORRINE MURPHY, ESQ.  
11 Murphy's Law  
12 2620 Regatta Drive  
13 Suite 102  
14 Las Vegas, Nevada 89128  
15 (702) 820-5763  
16 (702) 665-7345 Fax

17 For the Defendants:

18 CRAIG R. ANDERSON, ESQ.  
19 Marquis Aurbach  
20 10001 Park Run Drive  
21 Las Vegas, Nevada 89145  
22 (702) 382-0711  
23 (702) 382-5816 Fax

24 Also present:

25 Dawn Beck, Videographer

\* \* \* \* \*

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 3

1

## INDEX

2

Page

3

RUSSELL BACKMAN

4

Examination by Ms. Murphy

5

5

\* \* \* \* \*

6

7

## EXHIBITS

8

No.

Description

Page

9

Exhibit 1

Notice of deposition

6

10

\* \* \* \* \*

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 4

1 LAS VEGAS, NEVADA

2 Thursday, October 3, 2024

3 1:10 p.m.

4 DEPOSITION OF RUSSELL BACKMAN

5 \* \* \* \* \*

6

7 THE VIDEOGRAPHER: Good afternoon. We  
8 are now on the record. This begins the videotaped  
9 deposition of Russell Backman. Today's date is  
10 October 3rd, 2024. The time on the video monitor  
11 is 1:10 p.m.

12 We are located at 400 South Seventh  
13 Street in Las Vegas, Nevada. This case is  
14 entitled Latia Alexander, et al., versus Las Vegas  
15 Metropolitan Police Department, et al. The case  
16 number is 2:24-cv-00074-APG-NJK in the United  
17 States District Court, District of Nevada.

18 My name is Dawn Beck, legal  
19 videographer. The court reporter is Heidi  
20 Konsten. We represent Lexitas.

21 Will counsel please state your  
22 appearance for the record and whom you represent.

23 MS. MURPHY: Good morning -- or good  
24 afternoon. Corrine Murphy, Bar Number 10410, on  
25 behalf of plaintiff.

1 MR. ANDERSON: Craig Anderson for the  
2 defendants.

3 THE VIDEOGRAPHER: Will the court  
4 reporter please swear in the witness.

5  
6 Whereupon,

7 RUSSELL BACKMAN,  
8 was called as a witness, and having been first duly  
9 sworn to testify to the truth, was examined and  
10 testified as follows:

11

12 EXAMINATION

13 BY MS. MURPHY:

14 Q Let the record reflect this is the time  
15 and place of the deposition of Russell Backman in  
16 the matter of Latia Alexander, et al., versus  
17 Las Vegas Metropolitan Police Department, et al.,  
18 Case Number 2:24-cv-00074.

19 Mr. Backman, my name is Corrine Murphy,  
20 and I'm an attorney. I represent the plaintiff,  
21 Latia Alexander, in this case.

22 Can you please state and spell your full  
23 name for the record?

24 A Yes. It's Russell Backman. And it's  
25 R-U-S-S-E-L-L, Backman, B-A-C-K-M-A-N.

1 Q Do you have a middle name?

2 A Yes.

3 Q What's your middle name?

4 A Leo, L-E-O.

5 Q And you have been -- I'm assuming that  
6 you have seen a copy of the notice of today's  
7 deposition --

8 A Yes.

9 Q -- requiring you to be here.

10 MS. MURPHY: And I don't have that  
11 with me, Madam Court Reporter, but I'll get that.  
12 And if we can please mark that as Exhibit 1.

13 (Exhibit 1 was identified.)

14 BY MS. MURPHY:

15 Q And that -- you understand that today  
16 we're here to discuss the officer-involved  
17 shooting of Isaiah Williams?

18 A Yes.

19 Q Have you ever given your deposition  
20 before?

21 A No.

22 Q And is there any reason, as we sit here  
23 today, that you would not be able to understand my  
24 questions and give your best, most truthful  
25 testimony?

1 A No reason.

2 Q Okay. Are you any -- are you under any  
3 medications or anything that would inhibit your  
4 ability to provide truthful and reliable --  
5 reliable testimony today?

6 A No.

7 Q Okay. Can you please state your address  
8 for the record?

9 A It's 3681 Via Di Girolamo, Henderson,  
10 Nevada 89112.

11 Q Thank you.

12 Could you please tell me everything that  
13 you did to prepare for today's deposition.

14 A As far as preparation, I met with  
15 Mr. Anderson.

16 Q And I don't want to know how long -- I  
17 don't want to know what was discussed between you  
18 and Mr. Anderson. I'm not entitled to know that.  
19 That's confidential, attorney-client privilege --  
20 or, sorry, privileged information.

21 But I would like to know how long you  
22 met with Mr. Anderson and how many times.

23 A I met with Mr. Anderson two times,  
24 approximately 45 minutes, probably, each time.

25 Q Okay. And did you meet with anyone else



1 from Mr. Anderson's office to prepare for today's  
2 deposition?

3 A No.

4 Q Okay. And other than meeting with  
5 Mr. Anderson, what else did you do to prepare for  
6 today's deposition?

7 A I read my CIRT statement.

8 Q And if I -- if -- just to -- I believe  
9 that I have that one as well. That was  
10 approximately 75 pages.

11 Are you talking about your recorded  
12 statement?

13 A Yes, ma'am.

14 Q Okay. And how -- okay. And other than  
15 reviewing your -- your CIRT statement, did you  
16 review anything else?

17 A Yes. I reviewed the final CIRT report.

18 Q Okay. And that report is pretty  
19 lengthy.

20 Did you read that entire report?

21 A I went through a lot of it, yes.

22 Q Okay. And did you read all of the  
23 conclusions, which is, I think, approximately the  
24 last 20 pages?

25 A Yes, I read it.

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 9

1 Q Okay. And I'll ask you more about those  
2 later.

3 Is that a complete list of what you did  
4 to prepare for today's deposition?

5 A I also read another statement that was  
6 given prior to -- by Officer Bertuccini.

7 Q Okay.

8 THE COURT REPORTER: I'm sorry. I'm  
9 going to have to have you speak up, sir. By  
10 officer whom?

11 THE WITNESS: Bertuccini. Bertuccini.

12 BY MS. MURPHY:

13 Q And was it his CIRT statement that  
14 you -- his recorded statement that you read?

15 A It was the statement from here.

16 Q Oh, his deposition transcript?

17 A Yeah.

18 Q Okay. And having gone through  
19 Officer Bertuccini's deposition transcript, was  
20 there anything in there that surprised you?

21 A No.

22 Q Was there anything that you disagreed  
23 with?

24 A I'm not -- no.

25 Q Okay. Did you bring any of the

1 documents that you reviewed with you here today?

2 A No.

3 Q Okay. And other than

4 Officer Bertuccini's statement -- or deposition

5 transcript, have you read any of the other

6 officers' deposition transcripts?

7 A No.

8 Q Okay. Have you discussed the

9 deposition -- your deposition here today with any

10 of the codefendants?

11 A No.

12 Q Is your supervisor aware that you're

13 here today?

14 A Yes.

15 Q Is this part of your normal working

16 schedule?

17 A Yes.

18 Q Okay. So you got a day off today to

19 come do this deposition?

20 A Yeah.

21 Q I don't know which one is better or

22 worse.

23 A We'll find out.

24 Q Correct.

25 Okay. And so I'm going to ask you some

1 background questions now.

2 And do you prefer that I call you  
3 Russell or Sergeant Backman?

4 A You can call me Russ. That's cool.

5 Q Russ. Okay.

6 Russ, you're currently living in  
7 Henderson.

8 How long have you lived here for?

9 A In Las Vegas or in Henderson?

10 Q Well, both.

11 A I've been in the valley since 1997.

12 Q Okay. And how long have you been at  
13 your Henderson address?

14 A Since 2019.

15 Q And is it fair for me to assume that you  
16 have no intention of moving currently?

17 A No, I don't have any intention.

18 Q All right. What's your highest level of  
19 education?

20 A Some college.

21 Q Okay. Where did you attend some  
22 college?

23 A CSN.

24 Q Okay. And what -- what partial degree  
25 did you obtain there? Like, what was your focus?

1 A It was just general studies.

2 Q Okay. And when -- are you a member of  
3 any professional organizations related to your  
4 profession?

5 A As far as?

6 Q I don't -- like a shooting club or like  
7 an officers -- you know, pride club or --

8 A No.

9 Q Okay.

10 A No.

11 Q All right. And what's your current  
12 position?

13 A I'm a sergeant assigned to the SWAT  
14 team.

15 Q Okay. And you're still on SWAT?

16 A Yes, ma'am.

17 Q And so is it fair for me to assume that  
18 you're in the same position as you were when this  
19 officer-involved shooting occurred?

20 A Yes.

21 Q Okay. And can you please run me through  
22 your positions prior to that.

23 A Positions prior to that, I was a --  
24 well, if you want to start backwards -- or do you  
25 want to go chronologically? I can go either.

1 Q Why don't we start at the beginning and  
2 then lead up to --

3 A Okay.

4 Q -- your positions with --

5 A In the beginning, obviously I started  
6 off as a patrol officer, like every other officer  
7 does on the police department. I was then  
8 assigned, after several years, to a  
9 problem-solving unit.

10 From that problem-solving unit, I was  
11 assigned to the vice section. From the vice  
12 section, I was assigned to the narcotics section,  
13 where I spent five years. And then I was also  
14 assigned to the criminal intelligence section  
15 after that as a detective.

16 And then after the criminal intelligence  
17 section, I went back to patrol for a period.  
18 After that, I went back to the major violator  
19 section, which is -- used to be called repeat  
20 offenders, but it's major violators now -- as a  
21 detective.

22 And I promoted out of there as a  
23 sergeant. Went back to patrol for a brief period.  
24 And then after my patrol time and -- my patrol  
25 time, I went back to major violators as a sergeant

1 for about -- approximately 11 months. And then  
2 after that, I was assigned to the SWAT team where  
3 I am currently -- currently at now.

4 Q Okay. And you had gone back to patrol  
5 because you had a DUI issue; correct? There were  
6 some drinking issues?

7 A (Nodding head.)

8 Q Okay. Is that correct?

9 A Yeah.

10 Q Okay. What is -- what's a  
11 problem-solving unit?

12 A Basically it's the plainclothes unit  
13 that's assigned -- is assigned to do any type of  
14 follow-up investigations as far as investigative  
15 issues within the area command that you work.  
16 Like, you know, there's different area commands.  
17 And you're assigned there to investigate anything  
18 from property crimes, robberies, violent crimes,  
19 street-level crimes, street-level narcotics, stuff  
20 like that. It's a plainclothes unit usually.

21 Q Okay. And prior to your position in  
22 SWAT, is -- did you do any CET entries or serve  
23 any search warrants as part of -- in part of your  
24 duties in these other units?

25 A Years ago in narcotics, yes.

1 Q Okay. And how long -- and so narcotics,  
2 based on the chronology that you have given me,  
3 was very early on in your career.

4 What years did you work for narcotics  
5 during?

6 A 2006 to 2010.

7 Q Okay. And so I asked a double question,  
8 so I'm going to split it up.

9 Did you do CET entries as part of the --  
10 any search warrants that you served --

11 A Do you mean --

12 Q -- for narcotics?

13 A Explain --

14 Q Sorry. The control -- the C-E-T,  
15 controlled entry tactic, the --

16 A The controlled entry tactic, at that  
17 time, I never knew anything about that.

18 Q Okay. And so what -- when you served  
19 search warrants as part of the narcotic unit, how  
20 would you serve those?

21 A That would be done at the squad level,  
22 depending on how big the structure was. And it  
23 would be under the supervisor of -- the narcotics  
24 sergeant at that time and whoever was the case  
25 agent and the detective.



1 Q Okay. And so I guess my -- if I worded  
2 the question poorly, like -- was it, like, knock  
3 and announce and that kind of thing?

4 A Yes.

5 Q Okay. Did you do, like, explosive  
6 entries or --

7 A No.

8 Q Okay.

9 A No, no, no.

10 Q Okay. Do you have any specialized  
11 certification?

12 A For what?

13 Q For your job. Do you have any, like --  
14 I mean, other than being a SWAT officer. I know  
15 that in and of itself is a specialized  
16 certification.

17 A Right.

18 Specialized certification as far as?

19 Q So I'll give you an example.

20 Some of the other gentlemen that I have  
21 deposed in this case, they've talked about they  
22 had -- one gentleman, I think he had, like, a  
23 specialized certification for explosive entries.  
24 They had some -- that kind of specialized  
25 certification.

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 17

1           A     No, I don't have anything like as far as  
2     that, no.

3           Q     Okay.

4           A     I'm not -- I'm not -- no.

5           Q     Okay. Okay. Can you please explain to  
6     me what "knock and announce" means to you.

7           A     Knock and announce, are you talking --  
8     which -- which way we going, state or federal,  
9     here?

10          Q     Well, so all -- that's a really good  
11     question, and I'm glad you asked me that. And  
12     that allows me to, kind of, give us some  
13     groundwork for how I want you to answer the  
14     questions for the deposition.

15                 You were serving this at a state level;  
16     correct? I mean, the way that you were serving  
17     this -- this search warrant, obviously you're  
18     acting within the state of Nevada; correct?

19          A     Uh-huh.

20          Q     And so it would be the -- it would be  
21     the parameters on the state level -- you tell me.

22                 What -- as you were serving this  
23     warrant --

24          A     Right.

25          Q     -- what parameters applied to you, state

1 or federal?

2 A As far as -- for -- under both.

3 Q Okay.

4 A Yeah.

5 Q Okay. So then if you can give me both,  
6 then, what does -- what does "knock and announce"  
7 to you mean under the state standard and under the  
8 federal standard?

9 A Okay. The federal standard is being a  
10 reasonable amount of time for someone to come  
11 to -- come answer the door. State standard, which  
12 is an NRS, and I believe it's -- which one is the  
13 NRS you're talking about? Because there's a  
14 couple in there.

15 Q You -- we can just say NRS. I don't  
16 know the code number.

17 A Okay. All right.

18 Q I don't even think Craig does.

19 A Yeah. And for -- NRS, it means after  
20 you've notified your presence and authority and  
21 your intent to serve a search warrant, it would be  
22 there's no answer at the door, they don't know  
23 that you're there.

24 Q Okay. But, of course, I mean -- well,  
25 you tell me.

1           Is it your understanding that ultimately  
2   the federal standard is the one that prevails?

3           A     Federal always supersedes state, I  
4   believe, if I'm correct.

5           Q     Okay. So is it -- so then was it your  
6   understanding that the standard of a reasonable  
7   amount of time applied the day that you were  
8   serving this search warrant?

9           A     Yes.

10          Q     Okay. And by the day, of course I mean  
11   January 10, 2022.

12          A     Yes, ma'am.

13          Q     Okay. And so -- okay. And can you tell  
14   me what parameters -- and so you -- you  
15   articulated both the state and the federal  
16   standard really well.

17                Was that part of your training for SWAT,  
18   that you were educated on that, or did you know  
19   that already?

20          A     Gosh, I'm trying to think. I was  
21   assigned to the SWAT team 29 days. If I received  
22   that training while I was there, I don't -- I'm  
23   trying to think if I -- I don't recall that part.

24          Q     Okay. Would it -- let me ask the  
25   question a little bit differently.

1           A     You know, you would have to look at my  
2     training record. Maybe it's on there. I --

3           Q     No, no, no. That's --

4           A     I apologize.

5           Q     -- totally okay. Let me ask it a little  
6     bit differently.

7                     Do you think -- as we sit here today, do  
8     you think that you were likely aware of these  
9     standards on the -- on January 10th, 2022?

10          A     Yes.

11          Q     Okay. And you said "a reasonable amount  
12     of time."

13                    To your knowledge, is there any, like,  
14     minimum amount of time? Like, is there any  
15     parameter of, like, hey, it can't be less than  
16     this?

17          A     No. It's a reasonable amount of time  
18     based on -- you know, is there exigency or what  
19     type of crime you have? Is there a propensity of  
20     violence? Is there a violent individual in there?  
21     Are they willing to take up arms -- arms? Are  
22     they heavily armed? Are they -- can they fortify  
23     themselves inside that structure with it?

24                    There's -- there's a bunch of different  
25     parameters that can come into play with that --

1 Q Okay.

2 A -- as far as, like, a hostage situation  
3 or something. That's totally different. But  
4 that's -- that's a situation where that's  
5 life-threatening exigency.

6 Q Okay. And can you explain to me --  
7 we've kind of gone over it a little bit, but I  
8 kind of want -- I wanted, like, a real statement  
9 from you.

10 What is your understanding of the  
11 purpose of knock and announce?

12 A The purpose of knock and announce is to  
13 notify the occupants that you're there to serve a  
14 search warrant and notify them of your presence,  
15 authority, and your purpose.

16 Q Do you understand that it is part of a  
17 person's constitutional right to have clear notice  
18 of a police officer's intent to enter?

19 A Do I understand that?

20 Q Yeah.

21 A Yes.

22 Q Okay. What's the first and most  
23 important constitutional right that any individual  
24 has?

25 A Well, they're all important. Right?

1 Q Uh-huh.

2 A I think they are.

3 Q Do you think that there's one that's the  
4 most important?

5 A Fourth Amendment.

6 Q That's what you think is the most  
7 important?

8 A Well, I mean, Fourth Amendment and the  
9 First Amendment.

10 Q Right.

11 A Freedom of speech, press, and religion.  
12 I think that's probably the most important.

13 Q Okay. In performing your job as a  
14 police officer, do you agree with me that you have  
15 a duty to conduct yourselves such that you do not  
16 violate the civil or constitutional rights of  
17 members of the public?

18 A Yes.

19 Q Do you agree that if you see other  
20 officers violating the civil or constitutional  
21 rights of a member of the public, you have a duty  
22 to intervene and stop that officer?

23 A Yes.

24 Q What is a no-knock warrant?

25 A Well, a no-knock warrant is a search

1 warrant -- and I'll go through the process of it,  
2 of how it's actually done, because I think that's  
3 where you're going with this.

4 Am I correct?

5 Q Uh-huh, yes.

6 A So it's -- essentially a no-knock  
7 warrant is a search warrant that -- it would be --  
8 on the SWAT section would be a -- an affidavit  
9 would be prepared by a detective. They would  
10 articulate the verbiage in the no-knock search  
11 warrant for it to be a no-knock search warrant.

12 And they would get approval from their  
13 supervisor and their chain of command for a  
14 no-knock search warrant. In order for that --  
15 approval for that search warrant, that goes to  
16 them at their level. And then the -- for the SWAT  
17 side, it would be approved by the sergeant. But  
18 at the time, it was the captain. So it was a  
19 little -- the approval process was different.

20 But in order to have that search warrant  
21 approved, it would have to be approved all the way  
22 up the chain of command to the deputy chief on --  
23 on the no-knock search warrant. And then it would  
24 obviously have to be DA approval and signed by a  
25 judge.



1           Q     Okay. And this may seem like a basic  
2     question and in itself explanatory, but I still  
3     want your answer on the record for it.

4                     What's the difference between a no-knock  
5     warrant and a knock warrant?

6           A     A no-knock warrant means prior to  
7     entering the structure, there's no announcements.  
8     It's a no-knock. You don't make those  
9     announcements until you actually enter the  
10    threshold of the structure itself.

11          Q     Okay. Can you get a no-knock warrant on  
12    property-only search warrants?

13          A     No. Not that I -- well, I -- I should  
14    say depending on how it was articulated, but I  
15    would say no.

16          Q     Okay.

17          A     I would say that was -- no, correct.

18          Q     And so when are no-knock warrants used  
19    generally then?

20          A     No-knock warrants are used for somebody  
21    that's an extremely violent individual that is  
22    heavily armed, that would have the ability to  
23    possibly take arms up, harm an individual inside  
24    the actual structure itself or wherever it's at.

25                     A no-knock could also be utilized for --

1 depending on if it's a violent individual that's  
2 heavily armed or somebody that's very violent,  
3 when the officers are serving it -- their  
4 positions versus where the suspect would possibly  
5 be located at and if they would be in harm's way  
6 or not.

7 Q Okay. And I always say it wrong. I  
8 think it's "set," but is it actually C-E-T? Do  
9 they call it "set" or C-E-T?

10 A C-E-T.

11 Q CET. All right. I always call it  
12 "set." Sorry.

13 What is a CET?

14 A It's a controlled entry tactic.

15 Q And can you tell me what the purpose of  
16 a CET is?

17 A The purpose of a controlled entry  
18 tactic, there's obviously some parameters -- the  
19 purpose of the controlled entry tactic is to enter  
20 a structure or dwelling dynamically in order to  
21 overwhelm and take people into custody prior to  
22 them taking up arms, destroying evidence, before  
23 taking up arms.

24 It's for -- it's for a safety issue, the  
25 essential part of the CET. And that tactic is

1 utilized to flood that structure -- flood that  
2 structure and deem it -- dynamically to make it  
3 safe.

4 Q In this case, was the structure flooded  
5 and dynamically made safe?

6 A Dynamically and made safe?

7 Q Was it?

8 A It was afterwards. After we got shot at  
9 18 times.

10 Q Right. But upon the entry, was this  
11 dynamically made safe?

12 A Upon entry, we were fired upon 18 times.

13 Q Right. So it's a yes-or-no answer.

14 A The answer was after the shooting.

15 Q No. My answer -- my question is, when  
16 you entered the unit, was this -- did this CET  
17 entry make the unit dynamically safe?

18 MR. ANDERSON: Objection. Form.

19 Go ahead and answer.

20 THE WITNESS: No. I mean --

21 BY MS. MURPHY:

22 Q Can you use a CET entry on a  
23 knock-and-announce warrant?

24 A A CET is a -- at that time, that was a  
25 knock-and-announce warrant.

1           Q     Okay. As we sit here today, can you use  
2     a CET entry -- can you use a CET entry on a  
3     knock-and-announce warrant?

4           A     No.

5           Q     Okay. In your opinion, do you think  
6     that there was a conflict between knock and  
7     announce and a CET?

8           A     In my opinion at the time?

9           Q     Yes.

10          A     At that time?

11          Q     Yes.

12          A     No.

13          Q     Okay. What about your opinion today?

14          A     My opinion today, after being trained  
15     and going through some other things, depending on  
16     what it's for and how it's articulated and what  
17     the -- what the intel sheet report would -- would  
18     dictate on that exact answer.

19                 It's all situational, depending on the  
20     type of intelligence is there. And is there a  
21     violent person in there? Is -- are they -- do  
22     they have the ability to take up arms? Those  
23     would all be the factors of the CET with the  
24     knock-and-announce part.

25          Q     Okay. And what is a call-out and

1 announce?

2 A A call-out -- you're talking about the  
3 surround and call-out?

4 Q Yes.

5 A Okay. A surround and call-out --

6 Q And, listen, I've been in this case, but  
7 I still get some of the acronyms and names mixed  
8 up a little. So feel free to correct me on  
9 everything so that the record is accurate.

10 A Okay. So a surround and call-out -- a  
11 surround and call-out is basically we will  
12 surround the outer part of the structure,  
13 establishing containment on it with BearCats,  
14 which will be our armored vehicles. We'll place  
15 them in positions either in front of the house, on  
16 both of the corners, establish containment. We'll  
17 also put officers on the rear of the residence and  
18 on each side of the residence.

19 Once we have sufficient containment on  
20 the exact structure itself of the residence and  
21 everybody is set in place and it's -- we're not  
22 seeing any movement or anything -- or anything  
23 that's making us -- give us any alarms, we'll  
24 start the announcement process via the PA or the  
25 LRAD that's attached to the BearCat.

1           We'll give the announcements for several  
2 minutes, depending on what the case may be. And  
3 if we're not getting a response from inside, we'll  
4 usually go with a plan. We also try to telephone  
5 call-in as well, if we have a phone number for the  
6 individuals that are inside.

7           And that's all situational, based on the  
8 intelligence that we get from the detectives. And  
9 then we just go through our progressives. And  
10 then after that, we would start our breaching plan  
11 if we got no response.

12           Q     Okay. And because you were the -- you  
13 have given two very good descriptions of them.  
14 But because you were the sergeant on this, I want  
15 to ask you, for the record, to state, what is the  
16 difference between a CET and a call-out -- or the  
17 call-out?

18           A     A controlled entry tactic is a dynamic  
19 movement inside the structure to where we're going  
20 to take people into custody -- right? -- after a  
21 knock and announce -- after the announcements.

22                   The difference between that and a  
23 surround and call-out is we're trying to get  
24 inside that structure to deem it safe, because we  
25 know that there could be a violent individual in

1 there that could potentially take up arms. On a  
2 surround and call-out, with that case like that  
3 and as far as the CET -- let me back up here.

4 There's also some environmental factors  
5 along with the CET. You could look at the  
6 positioning. Was it -- is it a single-story  
7 apartment complex? Is it a two-story apartment  
8 complex? Is it a single-story house or a  
9 two-story house? Where is it located at? Is it  
10 an apartment complex where there's an apartment  
11 with an interior hallway?

12 Those are all mitigating factors on  
13 whether or not you can sufficiently contain an  
14 actual structure or an actual residence or house  
15 or whatever you're trying to serve the search  
16 warrant at.

17 Q And just specifically for this  
18 incidence, it was a -- or incident -- sorry -- it  
19 was a CET; correct?

20 A Yes. We utilized the controlled entry  
21 tactic.

22 Q As we sit here today, LVMPD policies  
23 would not allow for this type of CET to be used  
24 for this type of warrant; correct?

25 A As it sits now, we'd have to get

1 authorization and approval from the SWAT  
2 commander.

3 Q Well, didn't you have to get  
4 authorization and approval for this back in 2021?

5 A Yes.

6 Q Or 2022. Sorry.

7 A Yes. Yes.

8 Q Okay. But as we sit here today, haven't  
9 LVMPD policies been changed so that you could not  
10 serve this type of warrant with a CET?

11 A Correct.

12 Q Okay. All right. And so now we're  
13 going to -- we've kind of danced around it a  
14 little bit, but now we're going to jump into the  
15 actual facts. And we'll start with -- and I know  
16 you've read your statement. You -- you gave that  
17 within days of the incident itself.

18 And you were very detailed in there, so  
19 I'm assuming that you're going to be detailed --  
20 you've been detailed so far. So I'm just going to  
21 ask you some background questions, and we'll get  
22 into the facts.

23 So when was the -- your first awareness  
24 of the warrant?

25 A First awareness of the warrant would



1 have been a day off. I saw it hit the SWAT  
2 warrants, but I didn't -- I just kind of figured  
3 it was being worked out by the people above me.

4 THE COURT REPORTER: I need you to  
5 keep your voice up, please.

6 THE WITNESS: Okay.

7 BY MS. MURPHY:

8 Q And so you were -- would it be fair for  
9 me to say you were kind of peripherally aware? So  
10 a warrant came in, but --

11 A Yeah, you get the email notification on  
12 your phone. It doesn't go away, even though  
13 you're off.

14 Q Okay.

15 A It's always on.

16 Q Fair enough.

17 And -- and then what -- when did you  
18 become, like, familiar with -- with the actual  
19 warrant? Do you know what I mean by that?

20 A When was approval to be served? It  
21 would have been, I believe, Sunday when I went  
22 back into work.

23 Q Okay.

24 A If I recall correctly. It was either  
25 Saturday or Sunday.

1 Q Okay. And at that time, were you part  
2 of the -- there was recon that was done on this;  
3 correct?

4 A Yes. We went into work. We knew that  
5 we had a search warrant to serve. I got with the  
6 ATL, Jake Warner -- because I was a  
7 sergeant-in-training, and the actual sergeant --  
8 team sergeant at the time was Garth Findley.

9 He was off that day, so I was getting  
10 the warrant preparation parts done. So Jake  
11 Warner -- I talked to Jake Warner and said we had  
12 a warrant to serve. And then we got recon  
13 officers assigned to go out and conduct the  
14 recon --

15 Q And --

16 A -- for that --

17 Q Sorry.

18 A -- for that -- yeah.

19 Q I'll try not to interrupt you.

20 A Go ahead.

21 Q Sorry.

22 A Go ahead.

23 Q No, no, no. I don't want to interrupt  
24 you ever.

25 A Go ahead.

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 34

1 Q If you're not done answering, say "I'm  
2 not done."

3 A Go ahead.

4 Q So in terms of -- so when you say  
5 "ATL" -- does that mean assistant team leader?

6 A Yes, assistant team leader, and that  
7 assistant team leader --

8 THE COURT REPORTER: Okay. I need you  
9 both to slow down and talk one at a time.

10 BY MS. MURPHY:

11 Q When I say "ATL," does that mean  
12 assistant team leader?

13 A Yes.

14 Q Sorry. I know. Sorry.

15 All right. And, so, for the record, can  
16 you please just make that statement one more time  
17 so the court reporter can get it?

18 A Assistant team leader is ATL.

19 Q Okay.

20 A Yes.

21 Q And so explain to me kind of what  
22 position the -- what does ATL mean?

23 A It's an assistant to the team leader.

24 Q Sorry. That was a bad question.

25 What is their role in terms of, like,

1 functioning with what you're doing and how they're  
2 involved with --

3 A They assist with the day-to-day planning  
4 and operational -- anything that comes in  
5 operationally, they -- they assist with putting --  
6 they put the plans together. They get guys  
7 moving. They assist with the team and the actual  
8 assignments of where the guys are going and what  
9 needs to be done.

10 Q Okay. And so the ATL was working with  
11 you to come up with a plan on how to serve this  
12 warrant; is that --

13 A The ATL formulated the plan.

14 Q The ATL formulated the plan?

15 A Yeah, essentially, and then I sat -- go  
16 ahead.

17 Q No, no, no. Go ahead.

18 A Follow up with your question.

19 Q No, no, no. Go ahead.

20 A The ATL assigned the recon guys to go  
21 out before we came up with the plan, yes.

22 Q Okay. And so we've kind of gone over it  
23 a few times, but I like to sometimes rephrase  
24 stuff, because I want to make sure I understand it  
25 exactly.

1 A Okay.

2 Q You -- at this point in time, you had  
3 only been a sergeant in SWAT for a couple of  
4 weeks; correct?

5 A Yes.

6 Q Okay. And so you're sitting down with  
7 the ATL to kind of say, "Hey, this warrant's come  
8 in. We're going to get a plan together for it";  
9 correct?

10 A Correct.

11 Q Okay. If you had been out of the  
12 training period, would you have also still sat  
13 down with the ATL to put the plan together?

14 A Of course.

15 Q Okay. I'm just trying to figure out  
16 exactly what the functions look like.

17 And so would you have been the one that  
18 was kind of saying, "Hey, this is how I'm going to  
19 put it together," or would it still have been the  
20 ATL that said, "This is how we're going to put it  
21 together"?

22 A They come back -- they go out and they  
23 do the recon. They go out. They look at the  
24 structure. They look at all of the -- the  
25 environmental factors: Where the doors are at,

1 where it's located at, all of that stuff like  
2 that.

3 And they bring it back, and then they  
4 start formulating the draws and they start putting  
5 it together, the recon guys do. And then they  
6 give that information to the ATL, and then we look  
7 at -- the ATL looks at, kind of, like, how to  
8 approach that structure from a tactical position.

9 Q Okay. And at the time that you were  
10 formulating the plan with the ATL or the ATL was  
11 formulating the plan with you, did you understand  
12 that -- what the search warrant was looking for?

13 A Yes.

14 Q What was your understanding?

15 A The search warrant -- my understanding  
16 of the search warrant, it was a murder  
17 investigation, and they were looking for firearms.  
18 There was clothing listed on the search warrant  
19 itself. There was a -- I think a cell phone that  
20 was listed on -- I -- I would have to look at the  
21 search warrant again to go over all the items that  
22 we searched.

23 But there was also information that  
24 there was a suspect inside that residence that  
25 would -- that was involved in a shooting prior to

1 from the gang unit. And there was also a  
2 potential -- suspects in there that were heavily  
3 armed with the intelligence that we had.

4 Q And what intelligence was it that you  
5 had that indicated there were -- could potentially  
6 be heavily armed suspects inside the unit?

7 A There was a statement given -- there  
8 was -- the homicide detectives received -- on the  
9 search warrant itself, it said that it was a  
10 narcotic flophouse, that there -- people were  
11 armed in there. And it also mentioned that the  
12 affidavit -- in the affidavit, the search warrant  
13 itself, that Rembert -- Rembert was involved in a  
14 shooting -- involved in an illegal shooting.

15 Q Okay. And Rembert, Wattsel, also had  
16 a -- was he the one that had the ankle monitor;  
17 correct?

18 A I believe it was Corvel Fisher.

19 Q Okay. So did you believe that Rembert  
20 was likely inside the unit?

21 A From reading the search warrant, yeah.

22 Q Okay. But the indication for the search  
23 warrant, it was a property-only search warrant;  
24 correct?

25 A It was a property-only search warrant

1 for that part, right.

2 Q But my understanding -- you tell me if  
3 I'm right or wrong -- the way that it was actually  
4 administered or executed -- or whatever word you  
5 want to use -- was that it was really an arrest  
6 warrant.

7 You were going to arrest individuals  
8 that you felt were involved in a homicide;  
9 correct?

10 A It was the understanding at the briefing  
11 that there was no -- there was two suspects  
12 involved in a shooting prior to. There was a  
13 couple of other incidents where we knew that these  
14 two individuals that were involved in it had  
15 access to weapons. One of them was a -- they were  
16 each both documented gang members.

17 These gang members were documented with  
18 having a MP5 style rifle removed from their  
19 vehicle prior to -- prior to this. And there was  
20 another incident where there was an AR-15 that was  
21 recovered from another incident too, as well, by  
22 the gang unit.

23 The individuals that were supposed --  
24 that were -- we thought that would be inside the  
25 structure were Rembert and a Corvel Fisher.



1 Q Okay.

2 A And they were both documented gang  
3 members, and they had a prior criminal history for  
4 narcotics. And Rembert's stepmother had told the  
5 homicide detective that that was a narcotics  
6 flophouse and they were armed.

7 Q But for one of them, you had pinned his  
8 ankle monitor right before this incident; correct?

9 A Correct.

10 Q And he was not located inside this --  
11 what you want to call a flophouse; correct?

12 A Correct.

13 Q Okay. But I -- let me loop back to my  
14 prior question.

15 The way that it was being served was  
16 more akin to an arrest warrant; correct?

17 A I would say we -- no. I would say  
18 that -- that that warrant was being served because  
19 of the propensity of violence, them having arms  
20 inside that structure itself. And knowing that  
21 Rembert was also involved in an illegal shooting,  
22 but there was not an arrest warrant. Detectives  
23 just had probable cause to arrest him. And that's  
24 what we were notified of prior to the brief.

25 Q Sorry. Back up. So -- just because I

1 want to understand this a little bit better.

2 Prior to the briefing on this incident,  
3 you guys were informed right before the -- the  
4 briefing on this incident that they did have  
5 probable cause to arrest him?

6 A They had probable cause on one of the  
7 individuals, being Rembert, that he was involved  
8 in an illegal shooting.

9 Q Okay. But you guys weren't actually  
10 executing an arrest warrant; correct?

11 A We didn't have an arrest warrant.

12 Q Okay. Why -- did you think it was weird  
13 you didn't have an arrest warrant?

14 A At the time, the detectives said if he's  
15 there, we're going to arrest him. They didn't  
16 explain to us why.

17 Q Okay. And you thought he would be  
18 there; correct?

19 A Correct.

20 Q Okay. So this property search warrant  
21 was being looked at similar to an arrest warrant;  
22 correct?

23 A I would say that the property search  
24 warrant was looked at -- no. I would say it was  
25 looked at because we had violent individuals

1 inside that apartment complex -- inside that  
2 apartment that was a 650-square-foot apartment,  
3 one bedroom, one bath. And they were heavily  
4 armed inside there.

5 And that's how we looked at that search  
6 warrant, who -- what we thought would -- we knew  
7 that we'd -- we'd encounter -- that could be a  
8 possibility to encounter, and that's why we served  
9 that -- that's how we served that search warrant.

10 Q Okay. But you were aware that it was a  
11 property only search warrant; correct?

12 A For firearms, yes.

13 Q Okay. Were there -- obviously this  
14 went -- this didn't go as you guys had planned for  
15 a variety of reasons.

16 In terms of when you're serving a -- a  
17 warrant like this, with this type of entry, are  
18 there certain things that you need to know or rule  
19 out about the -- like whatever -- whatever  
20 structure you're going into?

21 A Know or rule out? Can you please --

22 Q Sure.

23 A -- explain?

24 Q Do you need to know or rule out if  
25 there's kids present? If there's elderly present?

1 If there's animals present? Like, are there  
2 certain things that you're supposed to rule out  
3 before doing this type of --

4 A Right. You would also take into  
5 consideration, for tactical purposes, whether or  
6 not there's children there, vicious dogs, elderly,  
7 stuff like that, absolutely.

8 Q Was any of that known prior to serving  
9 this warrant?

10 A What we do -- did know prior to serving  
11 the warrant per -- pursuant to what the detectives  
12 had told me, that they had never seen any kids  
13 there while any surveillance was conducted by the  
14 surveillance teams. And that it was a narcotics  
15 flophouse, and that there were numerous gang  
16 members that were associated with that place, is  
17 what I was told by detectives.

18 Q Okay. And as we sit here today, do you  
19 know how much surveillance was done on this unit,  
20 what -- in a buildup to serving this warrant?

21 A I know there were several dates where  
22 there was a squad out there -- a surveillance  
23 squad specifically that was out there doing  
24 surveillance on that apartment. I don't -- I  
25 can't -- I don't recall the exact specific dates.

1 I can recall and I can tell you that  
2 while they were out there doing surveillance, they  
3 were burned. And I believe somebody came out from  
4 the area of where that apartment was and went over  
5 to the surveillance vehicle and knocked on the  
6 window.

7 Q Okay. And so my earlier question still  
8 stands, though: Do you know how much -- well, do  
9 you know how much time was spent actually  
10 surveilling the unit?

11 A Look, I would have to refer to that  
12 report. But I would say it was probably -- there  
13 were several days that they went out there. I  
14 think several different occasions they went out  
15 there.

16 Q Okay. But I guess my question --

17 A Maybe a couple -- a couple shifts. I  
18 don't know exactly how much -- how long they  
19 spent. You would have to ask the detective  
20 that -- that led the case on that. I was just  
21 there for the -- to serve the actual search  
22 warrant.

23 Q Okay. So it's -- so it's fair for me to  
24 assume, then, as we sit here today -- and probably  
25 it was the same way back then -- you didn't -- you

1 don't know if they went out there and sat there  
2 for ten minutes or eight hours?

3 A Right. I was -- that wasn't relayed to  
4 me by the -- the detective. He just told -- he  
5 just relayed to me that they had surveillance out  
6 there before.

7 Q Would that have made a difference to  
8 you?

9 A Would it have made a difference to me as  
10 far as what?

11 Q In relying on their information.

12 A As far as what information?

13 Q That there weren't kids present. There  
14 wasn't dogs present. That there was -- that there  
15 was -- potentially that the actual suspects you  
16 were looking for were there?

17 A Yeah. I mean, obviously you're going to  
18 always take that information for what they give  
19 you, and you're going to use that as actionable  
20 intelligence, absolutely.

21 Q Okay. And in terms of the actual  
22 physical structure itself, are there certain key  
23 items that you want to know about the physical  
24 structure? For instance, like, is there a  
25 barricade on the door? Are there window blinds?

1 Those types of things.

2 A Of course.

3 Q Okay. And it's -- as we sit here today,  
4 were there a few different unknowns that were not  
5 known when you approached the unit, you can --  
6 that you're now aware of in hindsight?

7 A Where at on the unit are you  
8 specifically asking?

9 Q Well, was it known that there was a --  
10 that there was a kick plate on the door?

11 A You mean a brass wrap?

12 Q I'm sorry. A brass wrap.

13 A Yes. Not -- not at the time of --  
14 actually at the recon. Actually, once the guys  
15 got up to the door as far as the breaching  
16 element, I'm sure they noticed it.

17 Q Yeah, was that something that ought to  
18 have been known beforehand?

19 A Ought to be known?

20 Q Yes.

21 A Usually most cases, you always want to  
22 look at the front door, absolutely, and get a good  
23 look at it. I do -- I did understand that while  
24 they were conducting the recon, that the suspects  
25 had hopped the wall and actually went into the

1 door, and I think the door was open at the time  
2 that they did their walk-by on the --

3 Q I'm sorry. When you say "suspects," are  
4 you talking about --

5 A I mean -- I'm sorry. Individuals, but  
6 they -- they called them that to me. I'm sorry.  
7 It's -- I'm just recalling the verbiage that was  
8 sent to me.

9 But there were several males that hopped  
10 the wall and went inside that apartment, 1125,  
11 while they were doing the actual walk-by of the  
12 recon of the structure.

13 Q Okay. And why would that be relevant or  
14 important for you to know that information?

15 A Because our apartment was occupied.

16 Q Okay. All right. So now I'm going to  
17 get into the actual, kind of, mechanics of it.

18 So you arrive at Sam's Town; correct?  
19 What is it? Around 4:00 a.m.?

20 A Sam's Town, yes.

21 Q Isn't that where you guys, like --

22 A Briefed, yeah.

23 Q -- briefed. Yeah. I'm sorry.

24 So you arrived at Sam's Town.

25 And can you, kind of, walk me through



1 what happens there?

2 A That's where -- you know, the whole team  
3 showed up. We had our personnel, our manpower  
4 there. And we put our drawings up. The guys put  
5 their drawings up, and we had everybody together  
6 and we did the briefing --

7 Q Okay.

8 A -- along with the detectives.

9 Q And to the best of your knowledge, can  
10 you walk me through what the briefing entailed?  
11 The best of your memory, as we sit here today, can  
12 you walk me through what the briefing entailed?

13 A Obviously the briefing entailed the  
14 address, the structure we were going to. It went  
15 down the potential targets that would be in there:  
16 Their names, their criminal histories.

17 And during that, there was Corvel  
18 Fisher, who had the ankle monitor on. And then  
19 there was Rembert. His prior history was there.  
20 They were both -- they're documented gang members.  
21 And it went into whether there were kids there,  
22 dogs there -- et cetera, et cetera, et cetera --  
23 on the draw itself.

24 And then there was also another draw  
25 with -- where there was the planning of how we

1 were going to arrive and the route we were taking.  
2 And everybody's role and assignments was also up  
3 there as well, about who was doing what.

4 And then there was an actual briefing  
5 to -- what everybody's assignments were, and there  
6 was a brief back, everybody understanding it as  
7 well. And then there was detectives present, too,  
8 to enlighten everybody there on what their case  
9 was about.

10 Q Okay. And what was your role on the  
11 team?

12 A I was the -- I was the sergeant on the  
13 team in training. My role for the search warrant  
14 was I was operating the bullhorn.

15 Q Okay. And were you -- were you in  
16 charge of this operation?

17 A Sergeant Findley was in charge of the  
18 actual tactical operation.

19 Q Okay. And so then what was -- so were  
20 you there just for training purposes?

21 A I was there in training.

22 Q Okay.

23 A Yeah. He was -- he was the trainer.

24 Q Okay.

25 A But, yes, I was there.

1           Q     Sorry. I know I'm saying "okay" over  
2     and over again.

3                     And so would it be fair for me to say,  
4     then, that it was actually -- I'm just going to  
5     repeat back what you said to me.

6                     It was actually Sergeant Findley that  
7     was in charge of this operation?

8           A     Yes.

9           Q     Okay. And so -- and I think -- I know  
10    I've read it in your report several times.

11                    But how long had you been on SWAT for  
12    when you -- for this incident?

13          A     29 days.

14          Q     29 days?

15          A     Somewhere where it's --

16          Q     Okay. But it -- you were the one doing,  
17    kind of, the communicating; correct? Like, you  
18    were the one that sat down with the team -- the  
19    ATL. You were the one that said, "We're going to  
20    do this kind of unit." You're the one -- or this  
21    kind of entry.

22                    You're the one that was contacting  
23    different people to get authority to -- for  
24    different items; correct?

25          A     Yes. And I believe I assisted -- I

1 can't speak for them, but I thought Jake Warner  
2 also contacted Garth, who was off that day, and  
3 talked to him and spoke with him on the phone of  
4 what the -- what the plan was.

5 Q Okay.

6 A So Garth was aware of what -- of it, as  
7 well.

8 Q Okay. So leading up to the actual  
9 execution of the -- of the search warrant, you  
10 were taking the command role; correct?

11 A Prior to the execution of the search  
12 warrant?

13 Q Yeah. So sorry. And let me ask it --

14 A The day before I was there helping  
15 facilitate, getting manpower, getting certain  
16 things done. And then I requested the CET to the  
17 SWAT lieutenant. Yes, I did.

18 Q So let's back up a little bit.

19 Can you walk me through the -- the  
20 process of -- of requesting the CET?

21 A Requesting the CET?

22 Q Yeah.

23 A Yes. In order to request for the CET,  
24 you have to notify your lieutenant, and the  
25 lieutenant approves whether or not the CET is

1 approved or not per section policy.

2 Q And who was your lieutenant at the time?

3 A That would have been Lieutenant Melanie  
4 O'Daniel.

5 Q And to the best of your memory, as we  
6 sit here today, can you walk me through the  
7 communications that you had with Lieutenant  
8 O'Daniel regarding getting the CET authorized?

9 A I spoke with Lieutenant O'Daniel on the  
10 phone, and I -- we explained to her that it was a  
11 small apartment; we couldn't contain it with  
12 BearCats due to the environmental factors.

13 Q Sorry. Who is "we"?

14 A I did. But that was because of -- we  
15 had gathered from the recon guys and the ATL, we  
16 had received that information that we couldn't  
17 sufficiently contain that structure itself. The  
18 propensity of violence of the individuals that  
19 were in there, knowing that they were heavily  
20 armed potentially, with the prior weapon stops  
21 that they had with the AR-15 and the MP5.

22 And due to the fact that Wattsel  
23 Rembert's mother said that there was a narcotics  
24 flophouse -- I know through my training and  
25 experience, a narcotics flophouse means that

1 there's going to be guns in there usually. That's  
2 usually how it rolls.

3 Narcotic sellers and dealers are --  
4 protect their product, and they have guns. That's  
5 just -- that's -- that's what happens in --  
6 sometimes in these cases.

7 So that was the explanation that I gave  
8 to Lieutenant O'Daniel, was there was the  
9 violent -- propensity of violence, and we were  
10 going after a murder suspect. And there was a --  
11 there was an outstanding gun.

12 Q Okay. And so I'm glad that you brought  
13 that up, because I want to understand your point  
14 of view as well.

15 So part of your point of view, as having  
16 worked these prior units, is that if you hear  
17 narcotic flophouse, you think automatically  
18 there's going to be guns --

19 A I didn't say automatically.

20 Q Oh, well, I --

21 A I said I knew -- I knew from my training  
22 and experience that there's a possibility they  
23 could be there.

24 Q And so if I say possibility or  
25 probability, do you understand the difference

1 between those two?

2 A I would say probability, because drug  
3 dealers, they protect their product. And how are  
4 they going to protect their products? They  
5 protect them with guns.

6 Q So in the day before executing the  
7 search warrant, you thought that it would be a  
8 probability that there would be armed and  
9 dangerous individuals in the unit; is that  
10 correct?

11 A Due to the intelligence that we had,  
12 absolutely, with the prior stops and the -- the  
13 two suspects that were listed on the incident and  
14 accident plan.

15 Q And that is part --

16 A They were documented gang members as  
17 well.

18 Q And that is part of what -- what you --  
19 that is part of what you communicated to  
20 Lieutenant O'Daniel when you were discussing your  
21 request to have a CET; correct?

22 A Yes.

23 Q And in addition to the CET, you also had  
24 some distraction device -- they're called  
25 distraction devices; right?

1 A Yes.

2 Q Okay. Can you walk me through what  
3 you -- what you also had on this -- for the -- to  
4 execute the search warrant?

5 A I also had to have approval from  
6 lieutenant -- Lieutenant O'Daniel to utilize a  
7 stun stick, which is a distract device on a stick.

8 MS. MURPHY: We've been going a little  
9 under an hour. Why don't we take a short break.

10 THE VIDEOGRAPHER: We are going off  
11 record at 1:52 p.m.

12 (Whereupon, a recess was taken.)

13 THE VIDEOGRAPHER: We are back on  
14 record at 1:59 p.m.

15 BY MS. MURPHY:

16 Q And, Russ, we just took a short break.  
17 But I just want to confirm, the -- the oath that  
18 you took before we went on break still applies.

19 You understand you're still under oath;  
20 correct?

21 A Yes, ma'am.

22 Q Okay. And we were -- we had just begun  
23 talking about the distract devices that you got  
24 approval for to use on this -- this search  
25 warrant.



1 Can -- can we kind of go back to that,  
2 and can you walk me through what -- what -- what  
3 distracts you got and what approvals were  
4 necessary for those?

5 A Okay. Yes. We used the distract on a  
6 stun stick, 25 -- Def Tec 25 on the stun stick.  
7 And then we also used the -- it's called the  
8 9 bang distract, which is essentially a 25 that  
9 goes off nine times as -- as well on this  
10 operation. And the stun stick had to have  
11 approval from Lieutenant O'Daniel.

12 Q And did the 9 bang have to have  
13 approval?

14 A The nine bang itself?

15 Q Yeah.

16 A No. It was just a -- it's just a  
17 normal -- it's just a distract that we use.

18 Q Okay. Why does the stun stick have to  
19 have approval and the nine bang doesn't?

20 A The stun stick itself was inserted into  
21 the residence. So any time that you insert a stun  
22 stick into a residence, you have to have approval  
23 from the lieutenant, which would be, at the time,  
24 the SWAT commander.

25 Q Okay. And why did you -- why did you

1 think that it was necessary to have a stun stick  
2 for this search warrant?

3 A Well, looking at the structure itself  
4 and then looking at the -- the people that  
5 potentially we thought would be in there, as far  
6 as we're going after a murder suspect. We know  
7 that they have -- they're heavily armed. We have  
8 intelligence that they're heavily armed.

9 We're going after the crime of murder.  
10 They have priors -- violent priors, and they also  
11 are documented gang members.

12 In order to insert that stun stick and  
13 clear out that window, the window that we used  
14 would -- we knew that that would be the living  
15 room. And that living room itself, if we can  
16 clear that out, we had a breach point, which would  
17 have been the front door, which would have  
18 assisted us in -- with clearing out that window  
19 and letting us know, if we got hung up at the  
20 door, where -- you know, the guys there could  
21 actually provide cover for us, and then also  
22 provide intelligence of what we had inside if we  
23 got hung up at the door or anything like that as  
24 well.

25 And the purpose of the stun stick would

1 be if there was somebody in there that was trying  
2 to do something that was violent or whatever,  
3 there was that distract device itself in there  
4 that could go off and that would disorient them if  
5 they were -- if they were going to do something,  
6 whether they were trying to run deep into the  
7 structure, into another room, or they were trying  
8 to move, grab something, or do anything like that.

9 Q So your understanding of the purpose of  
10 the stun stick is, in fact, to disorient; correct?

11 A The stun stick, yeah, it emits a --  
12 yeah, it disorients -- disorientate -- excuse  
13 me -- disorients somebody, yes.

14 Q Okay. And so I'm going to actually ask  
15 you, to the best of your knowledge, like, can you  
16 kind of walk me through what a stun stick  
17 actually, like, looks like? Like, how it's  
18 employed?

19 A It's a device that has a hood. It has  
20 the actual dis -- 25 depth -- 25 distract on it.  
21 And it can extend out. And it is utilized to  
22 insert through a window. And you insert it up at  
23 a high angle. And whoever is operating it itself,  
24 prior to would attempt to clear the area.

25 And then if they see somebody that is

1 right there or whatever -- if there's a kid or  
2 something, obviously they're not going to utilize  
3 it. And utilize that device in order to help the  
4 entry team basically disorientate or distract  
5 those individuals and draw their attention back  
6 towards that in order to go in there and actually  
7 safely take them into custody.

8 Q Okay. And you weren't the one that  
9 actually had the stun stick at the --

10 A No.

11 Q Okay. And so tell me then also, can  
12 you -- the title is a little self-explanatory, but  
13 I'm going to ask you to walk me through it anyway.

14 What's the nine bang?

15 A The nine bang is essentially a distract  
16 device that has nine ports, and it lets off nine  
17 distracts -- 25 distracts. It's a -- repetitive.

18 Q And so what's the bang -- what's the --  
19 I mean, we've got the video, so I know.

20 But how would you describe the bang?

21 A It's -- it's -- it's similar to the  
22 Def Tec 25. It's -- it's just nine ports, and it  
23 just goes off nine times in a rhythm, boom, boom,  
24 you know.

25 Q Okay. And what did you -- what was your

1 conversation with the lieutenant -- to the best of  
2 your memory, what was your conversation with the  
3 lieutenant in order to get the use of the stun  
4 stick authorized?

5 A Just like I explained before.

6 Q Okay.

7 A We had those two -- we had the  
8 intelligence of the violent individuals inside the  
9 apartment itself, that they were heavily armed,  
10 and we were also looking for a murder suspect.  
11 And the mother -- stepmother of those two -- one  
12 of those individuals had identified both of them  
13 as being the ones that were involved in the  
14 murder.

15 Q Okay. So is it fair for me to assume,  
16 the reason to do this CET and the reason to use  
17 the stun stick were the same?

18 A Correct, essentially. I mean --

19 Q Yeah.

20 A -- the -- insert a stun stick is not  
21 necessarily on any CET or all CETs, so -- I mean,  
22 that is utilized in order to help out the entry  
23 team, whether they get hung up or if there's  
24 somebody in there, to distract them or to, you  
25 know, keep them from fleeing, going into a back

1 room, or gathering something like that itself.

2 It's there to disorient somebody, if  
3 needed, and that's also on the individual operator  
4 itself --

5 Q Okay.

6 A -- on who is operating it.

7 Q What's a break and rake?

8 A A break and rake?

9 Q Uh-huh.

10 A That's a device that's used to clear out  
11 an actual window itself.

12 Q Okay. And so what is inserted first  
13 through the window for this? Is it the stun stick  
14 or the break and rake?

15 A I wasn't back there. I don't know  
16 exactly what -- what they used or how they cleared  
17 the out that window --

18 Q Okay.

19 A -- in the back.

20 Q All right. And so -- and so let's  
21 actually walk through the -- sorry. We went  
22 through the -- the briefing.

23 Then can you kind of walk me through  
24 what happened after that? So did you guys have  
25 the briefing at Sam's Town?

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 62

1 A Okay.

2 Q And then what happens next?

3 A After the briefing, we loaded up on the  
4 BearCats.

5 Q Okay.

6 A Got dressed, got our tactical equipment  
7 or. And we got on the BearCats, and we started  
8 heading towards 3050 South Nellis, 1125.

9 Q And what -- what tactical equipment did  
10 you have -- sorry.

11 What tactical equipment did you have on?

12 A A ballistic helmet, a ballistic vest,  
13 belt, gloves, tourniquet, stuff like that.

14 Q What were you armed with?

15 A I had two guns on me at that time. I  
16 had a GLOCK 34, and I was also armed with an M4.

17 Q Is that standard?

18 A What do you mean "standard"?

19 Q Is that what's standard -- like, if  
20 you're -- if you were serving -- that's a fair  
21 question.

22 If you were serving this kind of  
23 warrant, is that, like, what you would wear as a  
24 standard?

25 A Could be, depending on the operation,

1 depending on what type of tactic we're using,  
2 where you're at in the line. Depending on what  
3 type of operation it is, you could utilize two  
4 handguns instead -- instead of having a M4. It's  
5 just -- it's situational.

6 Q And, sorry, we talked about --

7 A And that's up to the operator itself --  
8 the SWAT operator itself on what they prefer.

9 Q Okay. And, sorry, we kind of -- I just  
10 wanted to -- this goes back a little -- goes back  
11 a little bit.

12 But in terms of the CET -- the CET, the  
13 time that you had been on SWAT, you had never done  
14 a CET before; is that correct?

15 A Not on the SWAT team, no.

16 Q Okay. Had you done it not on SWAT?

17 A No. Because that tactic didn't --  
18 that's the first time I had ever heard of the  
19 tactic, is when I was assigned to SWAT.

20 Q Okay. So -- okay. So I want to make  
21 sure I understand that statement correctly.

22 You had never even heard of this tactic  
23 before until you had been assigned to SWAT; is  
24 that correct?

25 A Essentially, right. Yeah, I didn't know



1 that that's what it was called.

2 Q Okay.

3 A Dynamic -- yeah.

4 Q Okay. And so you get on the BearCats.

5 And then kind of -- I mean, I -- it's -- I'm going  
6 to ask you to give me the dialogue. Obviously --  
7 like, you get on the BearCats.

8 Then what?

9 A We started heading towards -- we had  
10 body cams. Everybody -- I think I came on the  
11 radio and said, "Hey, everybody activate their  
12 body cameras." Everybody activated their body  
13 cameras, and we proceeded the route that was on  
14 the draw itself to the location.

15 Q Okay. And why did you activate -- is  
16 there, like, a certain policy for LVMPD of -- as a  
17 point in time when you have to activate the body  
18 cams?

19 A There's a certain point, I guess, when  
20 everybody is ready to go and you're starting the  
21 tactical operations and you're loading on the  
22 BearCats, in SWAT, we activate our body cameras.

23 Q Okay. And so you load on the BearCats.  
24 And you get to the actual apartment building.

25 Can you walk me through what happens

1 then?

2 A We disembarked the BearCats and got in  
3 the line.

4 Q Okay. And can you walk me through, to  
5 your memory, what -- what -- what did the line  
6 consist of?

7 A The actual stack itself, we had our  
8 breaching element with Officer Hoskins and Levi  
9 Hancock. And then we had our line, which was --  
10 Officer Kubla was number one. Number two was  
11 Brice Clements. Number three was Jake Warner. I  
12 was number four, myself. And then Alex Gonzalez,  
13 who is now a sergeant, was number five.

14 Number six -- I would have to look back  
15 at the draw, but, I mean, for -- it's -- all of  
16 the rest -- the rest of the guys on the team --

17 Q Okay.

18 A -- were in that line too.

19 Q And where were you relative to everyone  
20 else?

21 A I was number four.

22 Q Okay. So were you in actually the  
23 lineup in front of the door, or were you off to  
24 the side?

25 A At that point in time, because of the --

1     how we lined up, the door was recessed back. I  
2     was off to the side.

3             Q     Okay. And who gave the announcement?

4             A     For the target apartment, I did. I had  
5     the bullhorn.

6             Q     Okay. Why don't we stop here, and then  
7     we'll actually play the video.

8             A     Okay.

9                     MS. MURPHY: Okay. Give me just -- if  
10    we want to go off the record, give me just a  
11    minute to pull up the video.

12                    THE VIDEOGRAPHER: We are going off  
13    the record at 2:09 p.m.

14                             (Whereupon, a recess was taken.)

15                    THE VIDEOGRAPHER: We are back on  
16    record at 2:11 p.m.

17                    THE WITNESS: Is that mine?

18    BY MS. MURPHY:

19             Q     Yeah. Tell me -- it should be yours.

20             A     I'm asking you.

21             Q     Okay. It's the one that's marked as  
22    yours.

23             A     It was two years ago.

24             Q     The sound should be coming on. Give me  
25    one second.

1           A       Okay.

2                       (Video played.)

3                       THE WITNESS: I didn't touch it. It  
4 stopped. My hands are right here.

5 BY MS. MURPHY:

6           Q       Were you on the BearCat?

7           A       Yes.

8                       MS. MURPHY: Did it stop again?  
9 Yikes. All right. Thank you.

10                      (Video played.)

11 BY MS. MURPHY:

12           Q       Are you okay? Do you want to take a  
13 break?

14           A       I'm good.

15           Q       Are you sure?

16           A       Yeah.

17           Q       Okay. We can -- we can totally take a  
18 break. There's no problem at all.

19                      THE WITNESS: Do you need to take a  
20 break?

21                      MR. ANDERSON: I don't need to take  
22 one. But if you do, take it.

23                      THE WITNESS: No.

24 BY MS. MURPHY:

25           Q       Do you want to take a break?

1                   And so, Russ, I think you gave me the  
2   list of things that you had reviewed beforehand.  
3   And I don't remember, I'm sorry, even though it  
4   was just a couple of hours ago.

5                   Had you reviewed that video to prepare  
6   for today's deposition?

7           A       Yes, I --

8           Q       Okay.

9           A       -- reviewed it before. Yeah.

10          Q       Okay. All right. Okay. Is it hard for  
11   you to watch that video?

12          A       Hard?

13          Q       Yeah.

14          A       Unfortunately, there's a human life  
15   involved. Anybody in -- in any type of incident  
16   like that -- would be probably hard for them.  
17   Absolutely, it's hard, yeah.

18          Q       Okay.

19          A       But, I mean, it's just lucky to know  
20   that I'm alive and the rest of the team guys  
21   are -- letting them -- you know, it brings back a  
22   lot of emotions. But, yeah, I'm glad that we came  
23   out of there alive.

24          Q       Okay. And can you kind of tell me -- if  
25   it's not too hard for you, can you kind of tell

1 me, like, what kind of emotions is it bringing up  
2 for you to watch that video?

3 A To know that we all took a -- that --  
4 all of those rounds, 18 of them, I believe, and  
5 none of us got hit. And then looking at that  
6 muzzle flash pointed directly at me, I was able to  
7 go to work, do my job, and then come out alive.

8 Q Okay.

9 A Very fortunate.

10 Q And did you do any -- did you do any,  
11 like, treatment following this incident? Like any  
12 treatment with a therapist, a psychologist,  
13 anything like that?

14 A Yes, I went to --

15 Q Okay. How long did you do that for?

16 A Oh, gosh. I forget the exact length of  
17 it, but it was -- I don't know, standard time,  
18 whatever -- whatever that was. Like a month and a  
19 half, two months.

20 Q And did you have any -- were you -- were  
21 you put on, like, administrative leave or anything  
22 like that?

23 A Yes.

24 Q How long were you put on leave for?

25 A Oh, I was on administrative leave, I

1 believe, almost four months.

2 Q Okay. And since coming back, have you  
3 had any -- do you have any, like, ongoing mental  
4 health or psychological issues related to being  
5 involved in this officer-involved shooting?

6 A No.

7 Q Okay. Does it change how -- what  
8 happened -- does what happened here change how you  
9 serve search warrants today?

10 A You mean what happened on that incident?

11 Q Correct.

12 MR. ANDERSON: Can I just clarify?  
13 Are you asking the department, or him personally?

14 MS. MURPHY: Him personally. That's a  
15 fair clarification. Thank you, Craig.

16 THE WITNESS: Yeah, because I was  
17 confused. Thank you.

18 Me personally, you know, when you look  
19 at anything like that and you look -- at any time  
20 you go into the unknown, you want to always be  
21 prepared as much as you can. And with my training  
22 and -- that day, I relied on it and it came  
23 through.

24 Does that change anything as far as my  
25 opinion? I'm there to do a job, regardless if

1 it's serving a search warrant, a hostage rescue,  
2 whatever. So when I have to go to work and I do  
3 my job, I have to be as most -- I have to be as  
4 proficient as possible and have a clear head.

5 So does it change my opinion on my job  
6 and my tactics and what I do? No.

7 BY MS. MURPHY:

8 Q And, sorry, maybe I asked the question a  
9 little unartfully. I'm not asking if it changed  
10 your opinion on things. But I'm asking if it --  
11 well, maybe you answered it, the last part, but I  
12 just want to clarify.

13 In, kind of, like how -- how you do --  
14 how you execute search warrants today, did -- did  
15 this incident change anything, the way that you --  
16 you actually, like, do anything? Like, some of  
17 the other officers have answered, like, that --  
18 they have answered, like, they modified certain  
19 things or they're more aware. Like, it has had an  
20 impact on how they serve search warrants today.

21 Is that question more clear, or do you  
22 want me to rephrase it?

23 A Yes. Yeah, it's -- you know -- you  
24 know, I see your -- do you modify things?  
25 Absolutely. Any time you have a tragic event like



1 that, you always go back to the -- go back and  
2 look at what -- you know, what you can improve on,  
3 how you get better. Not individually, but also as  
4 my position as -- the team.

5 So you have to take all of those -- all  
6 of that into consideration and always learn from  
7 the outcome of that. There was -- unfortunately,  
8 there was a human life involved, and it's tragic  
9 that there's a gentleman that's deceased now. And  
10 for his family, I feel bad for his family.

11 Doing things differently? I would say  
12 you train harder. You work harder and make sure  
13 to be always prepared for the unknown and never to  
14 give up. And don't let off the gas pedal just  
15 because you think you know everything. That would  
16 be -- you need to always train and keep training  
17 harder, because you never know what you're going  
18 to encounter when you go through a door.

19 And obviously right there, we  
20 encountered a gentleman that shot at us 18 times  
21 and tried to kill us.

22 Q And one of the -- we can back up and  
23 kind of talk about the actual mechanics of it as  
24 well.

25 There was an issue with getting through

1 the door; correct?

2 A After watching the video, yeah.

3 Q Yeah.

4 A It took a little while.

5 Q And so what was the issue with getting  
6 through the door?

7 A After reading the reports and seeing  
8 that, the brass wrap obviously kept us from  
9 ramming that door -- can somebody ram the door one  
10 time? Yes, depending on their technique, how big  
11 and strong they are. But, you know, it's also  
12 technique.

13 I don't know what -- you know, he used  
14 the best technique he could, and that door -- door  
15 got opened after five hits.

16 Q Okay. When I say "call a tactical,"  
17 what does that mean to you?

18 A So tactical -- tactical --

19 Q That -- sorry. In terms of this  
20 incident. It may have meaning in a variety of  
21 other ways that I'm unaware of.

22 A Yeah, because I was, like -- okay. Yes.  
23 So in that incident right there, for  
24 that particular part at the door, calling tactical  
25 would mean we would pull back. That would -- that

1 would be a -- absolutely, that's -- and anybody  
2 can call it in the line, whoever is seeing  
3 whatever -- you need somebody behind -- you know,  
4 if there was somebody squirting out the window or  
5 somewhere else or something else going on, anybody  
6 on the operation could call tactical.

7 And that's where we pull back to cover.  
8 We reassess, we find out what's going on, slow  
9 things down, and then formulate a plan from there.

10 Q Okay. And having seen the video,  
11 knowing everything that you know now, do you think  
12 that a tactical ought to have been called that  
13 day?

14 A Yeah, I think that we -- that would have  
15 been -- looking at it now, yes, I would agree with  
16 that, yeah.

17 Q And I want to read you the legal element  
18 for knock and announce. And it is that if after  
19 notice of its authority and purpose, an officer is  
20 refused admittance.

21 Can you tell me, having watched that  
22 video, what Mr. Williams did to refuse admittance  
23 while the door was closed?

24 A Refuse admittance --

25 Q Yeah.

1           A     -- while the door was closed?

2                     He didn't answer the door. We made our  
3 announcement.

4           Q     Okay. Do you think that there was  
5 sufficient time for Mr. Williams to wake up, get  
6 up, walk to the door, and open the door within the  
7 amount of time between your announcement and the  
8 window being broken open?

9           A     You say wake up?

10          Q     Yeah.

11          A     How do you know he was sleeping?

12          Q     Well --

13          A     I'm asking.

14          Q     Okay. That's fair.

15                     We know that he was lying on the couch  
16 in a reposed position; correct?

17          A     I would say he was -- he was in a  
18 defensive position in a deep corner of a room when  
19 we entered and ambushed us, yeah. I would say --  
20 he shot at us 18 times.

21          Q     Okay. So you think that there's a  
22 potential that he might have been awake at the  
23 time?

24          A     I would say -- I would -- from what I  
25 can gather, after watching that, absolutely. I

1 think it was an ambush.

2 Q Okay. And so walk me through your --  
3 your thought process on that a little bit more.

4 A The minute Officer Kubla went through  
5 that door, he started taking rounds immediately.  
6 That gun was pointed directly at him. There's --  
7 I mean, you can see the muzzle flash.

8 Q Had --

9 A Anybody that's in a dead sleep -- and  
10 I -- I mean, I've -- I've never been in this. But  
11 anybody that's startled in a -- or comes out of --  
12 awake from a dead sleep and can shoot like that  
13 and place rounds like that that fast, they're one  
14 hell of a marksman.

15 Q Have you watched -- have you watched  
16 the -- have you watched the videos from the other  
17 angles?

18 A I've watched a couple.

19 Q Which other videos have you watched?

20 A I think I've seen Kubla's. I saw  
21 Alex -- Sergeant Gonzalez's, and I think I saw  
22 Officer Clements' -- sorry. No.

23 Q Okay.

24 MR. ANDERSON: And Rothenburg; right?

25 THE WITNESS: Yes, and Roth.

1 BY MS. MURPHY:

2 Q Okay.

3 A Yes, I'm sorry. James.

4 Q Okay.

5 A He's a sergeant too, as well, now.

6 Q Right. And so, listen, this is my only  
7 chance to speak to you until we go to trial, and I  
8 really do want to understand what you're going to  
9 go -- what you're going to -- what your intention  
10 is, if the case goes to trial, what you're going  
11 to say. And so I want to be really clear.

12 Is it your testimony, as we sit here  
13 today, that you think that Mr. Williams was awake  
14 at the time that knock and announce was made?

15 MR. ANDERSON: Objection. Form.

16 Go ahead and answer.

17 THE WITNESS: I don't know if the man  
18 was awake or not.

19 BY MS. MURPHY:

20 Q Okay.

21 A But you said he was sleeping.

22 Q Correct.

23 A I'm just answering it, like, how do we  
24 know he was sleeping?

25 Q Okay.

1           A     Because of where he was positioned at in  
2     that corner and the time it -- those rounds  
3     started firing off as we made entry, that was  
4     pretty fast. That guy was there -- that guy was  
5     actively shooting at us. He was there to kill us.

6           Q     Okay. And do you think that there's any  
7     possibility -- but you -- okay. So there's the  
8     possibility he was either awake or asleep.

9                     Being either awake or asleep, do you  
10    think that he had sufficient -- was there any  
11    indication before the door was -- was -- before  
12    the door was rammed open that he was going to  
13    refuse admittance to the officers?

14          A     We gave a reasonable -- a reasonable  
15    amount of time to serve the search warrant.

16          Q     Okay.

17          A     That's a 650-square-foot apartment, one  
18    bedroom. He was right there in that front  
19    bedroom. He never announced or said, "Hey, I'm  
20    coming to the door."

21          Q     Do you think that that was his duty, to  
22    say "I'm coming to the door"?

23          A     I wouldn't say it's his duty, but most  
24    people -- I've seen it happen before, that most  
25    people said, yeah, I'm to the -- I mean --

1 Q Okay.

2 A I mean, that's unless you have something  
3 to hide or you're, you know, setting something up.  
4 Then obviously you wouldn't. I mean --

5 Q And so I'm going to go back to my  
6 earlier question, because I just want to clarify  
7 this one more time.

8 Before the door -- while the door was  
9 closed, other than Mr. Williams saying, "Hey, I'm  
10 coming to the door," did he provide any indication  
11 to any of you or the other officers outside that  
12 he was going to refuse admittance?

13 A Refuse admittance?

14 Q Yes.

15 A I didn't hear him say anything, no.

16 Q Okay. And so we talked a little bit  
17 about what the reasonable amount of time is. And  
18 as we sit here today, my understanding is that you  
19 don't -- based on your training, your experience,  
20 you don't think that there's, like, a guideline  
21 for a number of seconds or anything like that;  
22 correct?

23 A I've never seen anything that's a  
24 guideline that says that there's a certain amount  
25 of time.



1 Q Okay. Do you think that -- we talked  
2 about it a little bit before, but I want to, kind  
3 of, grind into it a little bit more.

4 One of the issues that you talked about  
5 in terms of reasonability of time was what the  
6 search warrant was seeking; correct?

7 A We were going after a murderer.

8 Q You were -- and, sorry. And in this  
9 case, I just want to clarify. I understand your  
10 comment, but sometimes it comes out a little bit  
11 different on paper.

12 That part of your assessment of what a  
13 reasonable time was, because you were going after  
14 a murderer; correct?

15 A The totality of the circumstances, the  
16 size of the structure.

17 Q Okay.

18 A Right? The -- knowing that there are  
19 gang members in there. Knowing that the  
20 stepmother said it's a narcotics flophouse.  
21 Knowing that they're heavily armed, that they've  
22 been -- they've recovered firearms previously from  
23 them on previous stops, knowing all of that.

24 Q Okay. And so, Russ, I'm going to  
25 represent to you that there's some case law out

1 there that indicates that a reasonable amount of  
2 time can also be based on what the search warrant  
3 is seeking. And so, for example -- and I'll read  
4 you an excerpt from a -- from a -- from a case.

5 "After 15 to 20 seconds without a  
6 response, officers could fairly have suspected  
7 that Banks would flush away the cocaine if they  
8 remained reticent." And for the record, that's  
9 from page one -- that's case law cited from  
10 page 133 of the CIRT report.

11 And so one of the issues that it talked  
12 about in the CIRT report was a reasonable amount  
13 of time is also predicated on what type of  
14 evidence they're going after. So a reasonable  
15 amount of time will be lesser for something that  
16 could -- like cocaine, that can be flushed away in  
17 a toilet, or otherwise destroyed.

18 A Correct.

19 Q Is that consistent with your knowledge,  
20 or am I telling you something new?

21 A That's consistent.

22 Q Okay. Because you were -- you were on  
23 units before where you were going for narcotics;  
24 correct?

25 A Yes, ma'am, that's correct. I worked

1       there for five years.

2           Q       Yeah. And so you're aware that somebody  
3       can run to the bathroom and dump cocaine in the  
4       toilet and flush it?

5           A       I've seen all kinds of crazy things,  
6       yes.

7           Q       All right.

8           A       I've seen that, actually, yes.

9           Q       Okay.

10          A       I've seen run somebody to the back  
11       bathroom.

12          Q       Okay. But to confirm, in this case,  
13       although you had said that part of the totality of  
14       circumstances was that you believed that you were  
15       also going after a murderer, there was no evidence  
16       on that search warrant that could have been  
17       destroyed; correct? The gun can't be destroyed.  
18       The cell phone can't be destroyed. So there were  
19       no concerns like that; correct?

20          A       No, there was not.

21          Q       Okay. And the totality of the  
22       circumstances and the reasonableness of the amount  
23       of time goes back to the elements that you listed  
24       earlier; correct?

25          A       Right. The size of the structure, the

1 propensity for violence, the violent individuals  
2 being inside, yes, all of that stuff.

3 Q Prior to this search warrant, had you  
4 received any training about what elements you had  
5 to comply with under both U.S. and Nevada law for  
6 a proper knock-and-announce entry?

7 A Proper knock-and-announce entry?  
8 Specific training? I would have to refer back to  
9 my training record. I know the -- I know that  
10 with the -- how that goes. But official training,  
11 I think there was training in SWAT. I don't know  
12 if it was before this incident, but I know we had  
13 some training afterwards.

14 Q What was the subsequent training you  
15 had?

16 A The subsequent training was -- it went  
17 over the CETs, the surround and call-outs, the  
18 announcements, all of that stuff.

19 Q And how do they go over it? Can you  
20 give me a little more --

21 A Just went over it on a PowerPoint.

22 Q And what did the PowerPoint -- what  
23 information did the PowerPoints contain?

24 A Captain Cole went over it after he came  
25 back from NTOA.

1 Q What's NTOA?

2 A National Tactical Officers Association.

3 Q And how soon after this incident did  
4 Captain Cole come back and give training on CET?

5 A He went to a conference, and I don't  
6 know the exact date. I was out of work. I don't  
7 know.

8 Q You don't have to give me exact date.  
9 If you can give me a time frame, to the best of  
10 your knowledge, like within --

11 A I don't -- I don't have the specific  
12 time he went.

13 Q If I said within a month or two --

14 A I don't know.

15 Q Okay.

16 A I was off work.

17 Q So -- so if you were off work, then it  
18 was within that four months; correct?

19 A Or maybe it was directly right after he  
20 went, and then he put it on. I -- I don't  
21 remember.

22 Q That's okay.

23 A Yes.

24 Q Were -- were you part of that -- did you  
25 participate in that, or did you hear about it

1 after?

2 A The whole team was there. We  
3 participated in part of it. Yeah, I think --  
4 yeah, I sat through some of it.

5 Q To the best of your memory, was there  
6 any new information that was relayed about CETs or  
7 knock and announces during Capital Cole's  
8 presentation?

9 A I don't -- no, I don't think so.

10 Q Okay. Then so what was the purpose --  
11 to your understanding, what was the purpose of the  
12 presentation?

13 A It was just to refresh everybody.

14 Q Okay. Was there any discussion about  
15 a -- what a reasonable amount of time constitutes?

16 A I don't recall.

17 Q Okay. Was there any discussion about  
18 when a CET can be used -- or C-E-T can be used?

19 A A CET? There was discussions --  
20 discussions about the CET and why we used the  
21 tactic, but it's still the same stuff that we've  
22 talked about.

23 Q Okay. And so obviously -- I mean, my  
24 next question is, what was your training about CET  
25 before this incident?

1           A     The training before, you know, was -- it  
2     was all about notifying our presence out front,  
3     verbalizing everybody in the stack, you know,  
4     that's out in front of the structure. In training  
5     it was, you know, prior to making entry, everybody  
6     would verbalize very loudly, "Police department,  
7     search warrant" so that way the occupants inside  
8     would know, and also it would let the surrounding  
9     citizens know as well.

10           Q     Okay.

11           A     And to that point, CET also protects not  
12     only people inside a residence, but it could also  
13     protect citizens in -- in other -- other places  
14     too, as well.

15           Q     Okay. And so do you think that there  
16     was any possibility that Mr. Williams could have  
17     been confused by the distracts and not been aware  
18     that it was police officers coming through the  
19     door?

20                     MR. ANDERSON: Objection. Form.

21                     THE WITNESS: I -- I wasn't -- I  
22     don't -- I don't know what the man thought.

23     BY MS. MURPHY:

24           Q     Okay.

25           A     I couldn't tell you if he was -- I don't

1 know.

2 Q Okay. So then it goes both ways. You  
3 don't know if he was intending to murder police  
4 officers; correct?

5 A What I saw is, he was shooting at me.

6 Q Okay. But I -- and that's fair. So let  
7 me ask it a little bit differently.

8 There was no indication -- he never gave  
9 you --

10 A I wouldn't say he was trying to shoot  
11 me. I'm sorry. He was trying to kill me --

12 Q Okay.

13 A -- straight up.

14 Q Okay. But as we sit here today, do you  
15 have any knowledge -- can you identify or say  
16 anything that he was aware that you were a police  
17 officer?

18 A Can he say?

19 Q Could he -- sorry. Let me ask the  
20 question a little bit better. I know I'm skipping  
21 over my words a little bit.

22 What you -- what you have testified to  
23 up to this point in time was that your feeling --  
24 and I don't mean like that pejoratively. I'm  
25 really saying, like, your thought, your feeling --



1 A When you asked me my opinion --

2 Q Yes, was that he was trying to kill you  
3 and your team members; correct?

4 A That was my opinion, yes.

5 Q Yes.

6 And so my question is, as we sit here  
7 today, are you able to give me any information  
8 that would indicate that Mr. Williams was aware  
9 that you were police officers at the time of that  
10 shooting?

11 A We gave him the announcements on the  
12 bullhorn.

13 Q While also detonating distracts;  
14 correct?

15 A Well, the announcements were made prior  
16 to the distracts going off, some of them.

17 Q One announcement was made; correct?

18 A I would have -- you would have to put  
19 back and -- and if you're going to be specific,  
20 you know, and how many exact announcements were  
21 made, but there were a lot of announcements being  
22 made.

23 Q Okay. And I'm going to -- I'm going to  
24 cite to your -- your statement that you made, the  
25 recorded statement.

1           And so you were reading from your  
2     statement on page 35, Bates LVMPD802. This is  
3     from your statement, open quote, "The combination  
4     of these effects produce a psychological or  
5     sensory overload that can temporarily stun an  
6     individual," close quote.

7           What does stun -- to your understanding,  
8     what does stun mean?

9           A     Stun -- having been around these  
10    distracts in training, there's a lot of  
11    overpressure from the distract itself. The light  
12    itself, if you look at the distract, will cause  
13    you to look away. That would be -- most people  
14    would be stunned from that. And that's also part  
15    of the manufacturer -- it comes from the  
16    manufacturer that it's a -- it's called a stun  
17    stick. It's for a stun.

18           It's to disorientate somebody. To get  
19    them to stop what they're doing, to temporarily  
20    disorientate them, and then actually safely take  
21    them into custody and get them to stop doing  
22    whatever they're trying to do -- like, whatever  
23    violent type of thing they're trying to do while  
24    you're deploying it.

25           Q     It can also confuse them; correct?

1 A Very temporarily.

2 Q Okay. And what's your definition of  
3 "very temporarily"? I know it's hard to quantify  
4 these amounts, but I have to ask you --

5 A Each -- each person is different.

6 Q Right.

7 A And I would say I can't really put a  
8 specific time on that, because what would affect  
9 me would affect you differently or it would affect  
10 anybody in this room differently.

11 A second, half second, you know, two  
12 seconds. It's just -- everybody -- it's -- it's  
13 to temporarily disorientate somebody,  
14 temporarily -- it's -- I don't have a set time I  
15 can give you.

16 Q Okay. In this case, it would be fair to  
17 say that this did not cause Mr. Williams to become  
18 compliant; correct?

19 A I would say that he was not compliant.  
20 He was shooting at us after they went off. He  
21 shot at us 18 times.

22 Q And do you think that being stunned  
23 could interfere with somebody's ability to  
24 understand that it was police coming through the  
25 door?

1           A     Prior to that, we gave him announcements  
2     that we were the police; we were serving a search  
3     warrant. Could it? I mean, I -- we won't know  
4     because -- I don't know.

5           Q     So my question was a little bit  
6     different, though. It was "could it." Could  
7     it -- could being stunned prevent somebody from  
8     understanding that it's the police coming through  
9     the door?

10          A     It's a possibility, yeah. It could,  
11     yeah.

12          Q     Okay. All right. All right. And so,  
13     Russ, I'm going to -- I'm going to skip around a  
14     little bit, but I'm going to read some of the  
15     conclusions in the CIRT report --

16          A     Okay.

17          Q     -- and I'm going to ask your opinion on  
18     them.

19                     And just to clarify, you read -- we  
20     discussed at the very beginning of the deposition,  
21     you did read the -- read most of the CIRT report;  
22     correct?

23          A     Yes, ma'am, that's correct.

24          Q     Yeah. And I'm assuming -- you tell me  
25     if I'm right or wrong. It's a thick report, and

1 it's hard to get through.

2 A It is quite long, yes, it is.

3 Q Yeah. But you probably read the -- all  
4 the conclusions. Is that fair to say?

5 A It's fair to say, yes. Yes, ma'am.

6 Q Okay. All right. So I'm going to read  
7 to you the part -- it's the 3.6, and it's page  
8 215.

9 A Okay.

10 Q CIRT concluded, "While the SWAT section  
11 manual contained verbiage allowing for SWAT  
12 operators to conduct a CET for property when there  
13 is a threat of an armed and dangerous subject, it  
14 was not appropriate, given the amount of unknowns  
15 associated with Apartment 1125. There were  
16 numerous amounts of unknown factors, to include  
17 who was actually staying in the apartment and if  
18 there were children, elderly, or vulnerable  
19 individuals present inside the apartment.

20 "SWAT's decision to serve the 3050 South  
21 Nellis Boulevard search warrant as a CET was a  
22 policy/training failure and not within the  
23 standardized LVMPD tactics training and policy,"  
24 end quote.

25 And so, Russ, I want to ask you about a

1 couple of things. We talked earlier in the  
2 deposition about some of the unknowns. And what  
3 you had indicated to me was that your memory was  
4 that the recon had ruled out that there was no  
5 children, no elderly, no vulnerable. And, in  
6 fact, based on the CIRT report, they had not ruled  
7 any of those things out.

8 A I would say on the recon, they didn't  
9 see a kid's toy out front; being a small bike, a  
10 tricycle, a Big Wheel, something like that, or any  
11 toys -- any children's toys on the patio or  
12 anything like that that would indicate that there  
13 were children there. That's what the recon  
14 brought back.

15 Q Okay. In terms of elderly or vulnerable  
16 individuals, they had also not ruled those out  
17 either; correct?

18 A Well, you could say that would be more  
19 on the investigative side on whether that was  
20 ruled out or not, not on the SWAT section, on the  
21 recon guys.

22 Q Okay. And then also who was actually  
23 staying in the apartment, there was no knowledge  
24 of who was actually staying there; correct?

25 A Except for the statement that the

1 homicide detectives got in reference -- Rembert's  
2 stepmother saying that's where he lived.

3 Q And hadn't she said that he had stayed  
4 there months earlier, and she wasn't sure where he  
5 was now?

6 A If that's what it says in the search  
7 warrant.

8 Q Okay. Not in the -- okay.

9 And then what's your opinion where it  
10 concludes that this was a policy training failure  
11 and not within standardized LVMPD tactics?

12 A Well, and that's obviously the SMEs, and  
13 I don't know who they were or how they drew all of  
14 their conclusions to those certain factors that  
15 you just pointed out.

16 I would say everybody has an opinion.  
17 Right?

18 Q I think I know where you're going with  
19 the rest of that statement, but let's keep it  
20 clean for the transcript.

21 A You know, in -- looking at this as an  
22 opinion, were we within policy of the section at  
23 the time of the section? Everything that I did  
24 that I relayed to my boss was within section  
25 policy, yes.

1 Q Okay. All right.

2 A I did -- and I relayed everything to  
3 her, the information that I had, and said, "Hey,  
4 this is what we have and this is where -- this is  
5 the tactic that we want to use," and she approved  
6 it.

7 Was that within -- without being in  
8 standards of LVMPD policy? I don't -- that's --  
9 that's the question -- that's a million-dollar  
10 question there. I mean, that's very, very  
11 debatable there.

12 Q Okay.

13 A I mean, different people are going to  
14 have different -- you know, different viewpoints.  
15 And I would say it's the -- we'll use the word  
16 viewpoints.

17 But my -- my viewpoint on this is, we  
18 can always get better. And there's some things  
19 that you can -- you always learn from any incident  
20 that you're a part of or on. And we could have  
21 sent the recon team back out again. They could  
22 have said, "Hey we did this and" -- you know, that  
23 could have happened again, stuff like that.

24 So, I mean, there are some things that  
25 could be done better, yes. There's some things --



1 I mean, and that's looking at it now after the  
2 fact. That's not knowing, you know, after this  
3 had happened before.

4 Q And so my --

5 A As far as the brass wrap door, I mean,  
6 there's other stuff too, you know.

7 Q What's the other stuff?

8 A That's -- that's it. You know, the  
9 brass wrap door, knowing that.

10 Q And so part of my -- my -- part of my  
11 understanding about what you've just said is that  
12 you kind of -- if we're going to call this, like,  
13 a -- to use a simple analogy, this whole thing is  
14 a pie. Right?

15 A Right.

16 Q And you're saying, hey, for my slice of  
17 the pie, I operated within policy and procedure.  
18 Is that fair to say?

19 A I did the best I could with all of the  
20 facts that I had.

21 Q Okay. And I'm going to read you another  
22 conclusion, and it's 3.8 from page 216. Open  
23 quote, "Under the conditions present here, six  
24 seconds was insufficient time to allow occupants  
25 time to answer the door, let alone submit to a

1 search," end quote.

2 Having -- you have extensive experience  
3 working for LVMPD. Although this was the first  
4 time you had done a CET, I think that you  
5 testified earlier that you have served search  
6 warrants and other -- you know, in other areas and  
7 other units.

8 Do you agree or disagree that six  
9 seconds was insufficient to allow time -- to allow  
10 sufficient time for an occupant to answer the  
11 door?

12 A That structure was a one-bedroom,  
13 one-bath apartment, a narcotics flophouse where  
14 people are up 24/7. From my experience --

15 Q And --

16 A -- of being narcotics, dealers, gang  
17 members, six seconds, knowing now how -- how this  
18 transpired, that was a -- we did what we could  
19 under a reasonable amount of time, and there's no  
20 set time. It's what's objectively reasonable at  
21 that time with the facts that you have.

22 So I don't -- whoever came up with that,  
23 is that -- was that an SME? Or where did that  
24 come from?

25 Q That -- and I'm happy to show it to you

1 too. It's -- give me one second. Let me pull up  
2 the -- it's conclusion --

3 A Because that seems like an opinion-based  
4 thing as well. Right?

5 Q Give me one second.

6 CIRT and SMEs. So it was both CIRT and  
7 SMEs that concluded that.

8 A Okay.

9 Q Okay. And that's from Section 3.8, and  
10 it cites case law as well. I'm happy to let  
11 you --

12 A Okay. I understand what you're saying.

13 Q Trust me, I'm not trying to misrepresent  
14 anything to you.

15 A Right. Yeah.

16 Q All right. And so if understand your --  
17 sometimes I like to read -- like I explained to  
18 you before, I like to read and write things,  
19 because I want to make sure I really understand  
20 them.

21 As we sit here today, it's your position  
22 that six seconds was -- based on the totality of  
23 circumstances, including the size of the  
24 apartment, that six seconds was sufficient time to  
25 allow him to -- to allow whomever inside the

1 apartment to let you guys gain access  
2 nonforcefully? I don't know if that's the right  
3 term.

4 A Six -- we went inside the door at 15  
5 seconds. The six seconds -- and you're asking an  
6 opinion-based question.

7 Q Uh-huh.

8 A Could it have been reasonable for what  
9 the person saw there at the time when they did  
10 that? Knowing that there was a -- we're going  
11 after a murderer and a murder suspect and they're  
12 heavily armed, it could be reasonable, yeah.

13 Q Okay. And then conclusion three -- part  
14 of Conclusion 3.9, open quote, "Officers  
15 immediately lost the elements of a CET, of  
16 utilizing speed to surprise and overwhelm the  
17 subject per their manual by being stuck at the  
18 door and hitting it multiple times prior to  
19 entering the residence," close quote.

20 And we talked about that a little bit  
21 before. And as we sit here today, you agree with  
22 that, don't you?

23 A Well, that's an opinion from an SME.  
24 Right? A viewpoint, you would say.

25 Q Correct.

1           A       That is a call that's not -- that is a  
2       call that you make at the time while you're there.  
3       And the point I would make is, okay, there's been  
4       one hit on the door with the ram. Is it flexing?  
5       Is -- are they getting flexion? Does it look like  
6       it's going to get ready to get open? Do you -- do  
7       you understand what I'm saying?

8           Q       I do understand.

9                   And based on the video, I don't think it  
10      was flexing.

11          A       Okay. That was -- that was my video.

12          Q       Right.

13          A       That I watched, I didn't see that.

14          Q       Okay.

15          A       Fair?

16          Q       Yeah, no, no, no. Fair.

17                  I'm telling you, from my point of view,  
18      I didn't see that it looked like --

19          A       The guys up front would make that call.

20          Q       Okay. And so -- okay. So then -- so  
21      then is it your position that the guys that are  
22      really right at the door, you would rely on them  
23      to call the tactical?

24          A       Absolutely.

25          Q       Okay.

1           A     You've got to rely on your people to do  
2     their jobs.

3           Q     Okay. And so going back to the  
4     statement itself, though, do you agree or disagree  
5     that you lost the elements of the CET by not doing  
6     an immediate breach?

7           A     Any time that you have an immediate  
8     breach, you're obviously going to have the element  
9     of speed, surprise, and overwhelming action on  
10    your side when it's -- when it's -- when it comes  
11    open with one hand. It was delayed.

12          Q     And, Russ, based on -- having read  
13    your -- the statement that you gave as part of  
14    this, one of the issues -- and you -- you read  
15    your statement recently.

16          A     Yeah.

17          Q     That you thought -- looking back on it  
18    now, one of the things that you would have changed  
19    is you thought this should have been an explosive  
20    entry; correct? I'm telling you what you gave --  
21    what statement you gave in your -- in your -- in  
22    your recorded statement.

23          A     With a brass-wrapped door with a tactic  
24    like that, knowing -- if we would have known that  
25    there was a brass wrap on that door, that would

1 have been definitely an option for a better tactic  
2 and a safer tactic for us. And also for the  
3 people there, to get that door down without  
4 having -- putting officers up front of it in  
5 harm's way, knowing that there's automatic weapons  
6 inside that residence with the possibility -- and  
7 we're going after a murder suspect too, you know.

8 So, yes, a brass wrap on that door  
9 would -- there -- a better tactic would be to  
10 utilize an explosive breach on that, after the  
11 fact, knowing this now.

12 Q Right. And so in your -- in your  
13 recorded statement, you said -- and I'm not trying  
14 to -- one of the statements, there was  
15 explosive -- when they asked you, "What you would  
16 do differently?" and your response was -- part of  
17 it was, "Explosive breach is the main one."

18 A That's one of the things -- and I guess  
19 I was answering that from an after-the-fact  
20 tactical spot of what I knew then and with the  
21 door having the brass wrap, after the fact.

22 Q Okay. And -- okay. And I -- if I've  
23 already asked this, you're going to have to --  
24 you're going to have to excuse me. I'm going to  
25 ask it one more time.

1 Do you think that a tactical ought to  
2 have been called?

3 A Ought to have been called?

4 Q Yes.

5 A In this situation?

6 Q Yes.

7 A It could have been. But the guys up  
8 front that saw it didn't make the tactical call.  
9 I was at the back, so I couldn't see what they  
10 were seeing. So for me to sit here and say -- to  
11 give it what they saw and what -- I can't say --  
12 yeah, five hits is a lot, because there's a lot of  
13 time on target.

14 However, I was -- they were trusted by  
15 Sergeant Findley, because he was the team leader  
16 at the time, that, hey, we're going to -- he --  
17 he's trusting them to make the call up front.  
18 Different SMEs, different peoples of opinion will  
19 probably say, yeah, that's a lot of time on  
20 target. That's a lot of time up front.

21 Other people would say, hey, no. We  
22 were there. We saw the door. We saw we were  
23 getting -- we were making headway, and they --  
24 they saw the door flexing, and they knew that it  
25 would come open.



1           It's -- it's all based on the person's  
2   thought and what they thought at the time and what  
3   they knew at the time based on what they saw at  
4   that time, which I didn't see.

5           Q     Okay. The other thing that you said in  
6   terms of when -- during your recorded statement,  
7   the things that you thought they should do  
8   differently, is you thought this should have been  
9   a no-knock search warrant; is that correct?

10          A     Yes, ma'am, that's correct.

11          Q     Okay. Could -- could this type of  
12   property-only search warrant have been approved  
13   for a no-knock warrant?

14          A     Well, I'll back up on that.

15          Q     You tell me -- like I said, other than  
16   trial, this is my only opportunity to talk to you.  
17   So you tell me exactly what you think and what  
18   your opinions are, because I want to know.

19          A     Opinions of the case, I would say that  
20   the gang unit had probable cause for a shooting  
21   with Mr. Rembert, and he was a shooter, which  
22   would take that and actually be a -- that's a  
23   felony, shoot -- you know, shooting at somebody.  
24   You know, there's a victim, whether it's, you  
25   know, assault with a deadly weapon, shooting at --

1 you know, we could go on and on and on.

2 Q Okay.

3 A So that would -- that could have changed  
4 some things with the case, knowing the  
5 relationship of the violent individuals in there,  
6 that we're also investigating a murderer, there's  
7 an outstanding murder weapon, that they have a  
8 high propensity of violence, and they're gang  
9 members, you know, on a drive-by recon that there  
10 was a brass wrap door on some stuff, yeah,  
11 absolutely, this could have been -- you know, this  
12 could have been a possibility on the investigative  
13 side, not on the SWAT side.

14 Q To do a no-knock -- to do a no-knock --

15 A They would have drafted that. We don't  
16 do that. That's -- that's -- that's -- that's on  
17 the investigative end.

18 Q Do you think that they ought to have  
19 done that?

20 A Do I think they ought to have?

21 Q Yeah.

22 A I don't have all of the facts --

23 Q Okay.

24 A -- pursuant to everything as far as the  
25 investigative side, because I wasn't there. I'm

1 saying it could have been an option.

2 Q Okay. So -- but as we sit here today,  
3 based on the type of search warrant that this was,  
4 it -- and I -- maybe you said it to me, and I just  
5 don't understand.

6 Based on the type of search warrant, is  
7 it your understanding that they could have  
8 obtained a no-knock warrant?

9 A They -- you would -- I would -- you  
10 would have to ask the investigative detail on  
11 that, specifically on what they had --

12 Q Okay.

13 A -- and all of the facts. Because, like  
14 I said, I don't know all of their facts on what  
15 crimes and -- and all the details of all of the  
16 actual specifics on that -- you know, on that  
17 part. I do -- you know, and even on the murder  
18 part, you know. There's -- there's probably some  
19 facts there that could have been articulated as  
20 well.

21 Q And then also from 3.9 on page 220, open  
22 quote, "CET only to be utilized when a no-knock  
23 search warrant is approved by the LVMPD and has  
24 judicial preapproval," close quote.

25 As we sit here today, is it your

1 understanding that the policy at LVMPD has been  
2 altered so that a CET can only be utilized when --  
3 when executing a no-knock warrant?

4 A Yes.

5 Q All right. And so if this same search  
6 warrant were to be executed today, it would be a  
7 surround and call-out; correct?

8 A Yes.

9 Q And then from the conclusion, 5.5, page  
10 218, "CIRT and SMEs concluded Lieutenant O'Daniel  
11 did not use proper discretion when she approved  
12 the use of a stun stick through the west-facing  
13 window." Portion omitted. "Lieutenant O'Daniel's  
14 management of tactics for the requested approval  
15 of tactics and tools, as the tactical commander,  
16 was not within standardized LVMPD tactics training  
17 and policy."

18 And, Russ, I understand that you may not  
19 want to comment on whether or not Lieutenant  
20 O'Daniel did her job correctly.

21 But do you have any position on that  
22 statement?

23 A Position as far as what?

24 Q Opinion on it.

25 A Opinion. Viewpoint/opinion.

1 Q Correct.

2 A I think Lieutenant O'Daniel got the  
3 facts relayed to her, and I thought she made the  
4 decision based off of what she knew at the time.  
5 And I -- I think that she did her job and the --  
6 that's obviously a very opinionated question  
7 coming from somebody on there as far as SME.

8 Am I correct on that?

9 Q Yeah, it's from the -- it's from the  
10 CIRT conclusion, so I think it's certain --

11 (Indiscernible crosstalk.)

12 A Yeah, you would have to ask more  
13 in-depth of Lieutenant O'Daniel of what she  
14 thought and why she -- why she, you know, did what  
15 she did with that and made -- made the calls that  
16 she made. I can't give you an exact explanation  
17 of what she thought and what she knew at the  
18 time -- you know, what her thought was.

19 Q Okay. And then I will -- from Section  
20 5.5, "Captain Cole and Lieutenant O'Daniel's  
21 approval of homicide IAP and search warrant for  
22 the use of SWAT service was not within  
23 standardized LVMPD tactics training and policy."

24 Do you have any position or opinion on  
25 that?

1           A     You would have to refer to what they did  
2     and -- what they did at the time. They made the  
3     decisions that they made because they were in  
4     those positions, about information that they were  
5     given, either through the affiant or through the  
6     affiant supervision or the case agent from  
7     homicide.

8                     So I don't know exactly, you know, how  
9     they came to that conclusion or what all the facts  
10    are. I don't know on that one.

11           Q     Okay. And as we sit here today, have  
12    you come to learn anything about Mr. Williams  
13    since this incident?

14           A     Learned anything about Mr. Williams  
15    since this incident?

16           Q     Let me ask a -- a better predicate  
17    question.

18                     As we sit here today, you probably  
19    assumed that that was either Wattsel or -- is it  
20    Corvel?

21           A     Fisher.

22           Q     -- Fisher at the time that you were  
23    executing the search warrant; correct?

24           A     Yeah.

25           Q     If you even had that thought.

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 110

1 Did you?

2 A I thought -- yeah, I thought that was --

3 Q Okay.

4 A You're getting shot at when you roll  
5 into a room. I mean, yeah.

6 Q And so as we sit here today, you  
7 understand that it was actually Isaiah Williams,  
8 not either of the two murder suspects?

9 A After the fact, yes.

10 Q Okay. Other than understanding that he  
11 was neither -- he was not one of the two murder  
12 suspects, do you know anything else about  
13 Mr. Williams, as we sit here today?

14 A I know that he had a mother. I feel bad  
15 for her, the family. Yeah. I mean, he's got --  
16 he's -- I mean, there's a mother involved here  
17 that doesn't have her son.

18 Q Yeah.

19 A But we're all alive as well.

20 Q Aside from Mr. Williams having a mother,  
21 do you know anything else about Mr. Williams?

22 A I've seen a picture of him, you know, I  
23 had -- after the fact. I knew nothing about him  
24 though.

25 Q Okay. And as we sit here today, in

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 111

1 fact, having gone to execute this search warrant,  
2 none of the items that were being sought in that  
3 search warrant were actually present in the unit;  
4 correct?

5 A You would have to ask the homicide  
6 detectives that did the search warrant. I don't  
7 know what --

8 Q You have no knowledge about whether or  
9 not they recovered anything?

10 A I don't have firsthand knowledge of what  
11 they recovered right now, no.

12 Q Okay. So -- okay. Okay. You do have  
13 firsthand knowledge that neither of the two murder  
14 suspects were within the unit; correct? The  
15 apartment unit.

16 A Obviously, yeah.

17 Q Okay. As we sit here today, would you  
18 qualify the execution of this -- this warrant,  
19 would you qualify it as a -- as a success or a  
20 failure?

21 MR. ANDERSON: Objection. Form.  
22 Go ahead.

23 THE WITNESS: There's a human life  
24 here. What's successful about that, a mother that  
25 doesn't have her kid? That's an absolute failure.



1           The success is, I'm sitting here today  
2   to be able to tell you about it, because I came  
3   out alive. Because I got shot at numerous times  
4   by that man. My kid still has a dad. Those other  
5   cops that I was in that room with, my partners, my  
6   teammates are still alive, who are all dads. And  
7   they're able to go home to their kids.

8           That's a success there. Because we're  
9   still alive. He chose that. He made that happen  
10  as a failure. He shot at us. That failure is  
11  him. He failed us. He shot at us 18 times.

12  BY MS. MURPHY:

13         Q     Okay. Other than the items that we have  
14  already discussed, whether it is using the -- an  
15  explosive breach, having a no-knock warrant, is  
16  there anything else that you would have done -- in  
17  hindsight, that you would have done differently?

18         A     Prayed more for that kid not to be there  
19  and shot at us.

20         Q     Okay. That's fair. If that's your  
21  answer, that's your answer.

22         A     Yeah, I wish that kid wouldn't have been  
23  in there and shot at us. If he wouldn't have shot  
24  at us, this wouldn't have happened.

25         Q     Yeah. All right. I'm just going to go

1 through -- I think I might -- oh, the other thing  
2 I wanted to ask you about is -- and we have -- you  
3 know, we need to cover it, Russ, is that you had  
4 not attended SWAT school; correct?

5 A Correct.

6 Q Okay. And can you -- as we sit here  
7 today, did you ever attend SWAT school?

8 A After the fact, yes.

9 Q Okay. And did you have to attend that  
10 before you went back on SWAT?

11 A Yeah. I attended it right when I came  
12 off administrative leave.

13 Q Okay. And can you kind of walk me  
14 through why you didn't -- why you had not attended  
15 SWAT at the time of this -- SWAT school, sorry, at  
16 the time of this incident?

17 A That would -- that was Lieutenant  
18 O'Daniel. They run a -- at that time, how the  
19 training section worked -- and this is -- this was  
20 at that time -- what was revealed to me by her was  
21 we run the SWAT school every March, and it was a  
22 timing thing.

23 Because according to what  
24 Lieutenant O'Daniel explained to me -- because I  
25 even asked her -- was it was because it's

1 labor-intensive. There's a lot of bodies. It  
2 takes -- it's a manpower-intensive school.  
3 It's -- you know, it's very intense, and they did  
4 it every March. And it just was the timing issue,  
5 because I transferred to the unit in December.

6 Q Why -- why did you transfer -- why did  
7 you transfer in December?

8 A Because that's when the opening was  
9 there.

10 Q Okay. Did you -- did you fill in  
11 somebody else's position?

12 A Yes.

13 Q Okay. And had you -- I mean, had you --  
14 I mean, I know that SWAT is very prestigious.  
15 Had you wanted -- obviously, had you  
16 wanted to join SWAT?

17 A Of course.

18 Q Okay. I'm going to ask you -- I'm going  
19 to -- I think I've covered almost everything. I  
20 just wanted to ask you about some of the stuff in  
21 your discovery responses.

22 Did you -- for -- in preparation for  
23 today's deposition, did you go over -- let me show  
24 it to you too. We call them interrogatories and  
25 requests for production.

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 115

1 A Yes, I've seen that.

2 Q Okay. All right. And I'm going to ask  
3 you about the citizen complaints. I'm just going  
4 to allow you a little bit more time and space  
5 to -- you've outlined them in response to Request  
6 for Production Number 17, which asks, "Produce a  
7 copy of all citizen complaints regarding the  
8 defendant" -- that's you -- "to which these  
9 requests were -- were directed."

10 And so I have -- one, two, three,  
11 four -- I have four citizen complaints.

12 Do you remember all of these, or did you  
13 want this to refresh your recollection?

14 A I might need to look at that to  
15 refresh --

16 Q Part of it is highlighted on the second  
17 page.

18 A Okay.

19 Q I'll just hand you those right now.  
20 Sorry, that's the first page. You just flip them.  
21 That's the page before. No, no, no. Sorry.

22 A You got two of them here. You said  
23 there's four.

24 Q No, no, no. Sorry. There's four  
25 incidents. So one, two, three, four, in response

1 to Request Number 17. One, two, three, four.

2 A Okay.

3 Q Can you kind of briefly explain those  
4 different incidents for me?

5 A Oh, yeah. Embarrassing, at least two of  
6 them are.

7 I got an off-duty incident where I was  
8 intoxicated and found in possession of a firearm  
9 was one. That was embarrassing. And then I  
10 received an off-duty DUI in 2015 while I was  
11 assigned to the organized crime bureau, criminal  
12 intelligence section. And that's when I was  
13 returned to patrol, and I gave you that statement  
14 in chronological order of my timeline in my  
15 career.

16 The next one, the citizen complaint that  
17 I stole money and whatnot, I'm trying to recall  
18 that. The defendant was one of the officers.  
19 That was the Larry Ronetti [phonetic spelling]  
20 incident. I think that was -- I had nothing to do  
21 with that. I don't think I was actually there for  
22 that. I don't know how my name is -- but -- but  
23 okay.

24 And then the property owner complained  
25 about being on his property, and we -- there was

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 117

1 no policy violation, obviously, on that. That was  
2 a patrol incident when I was a patrol sergeant  
3 with one of the guys.

4 Q Okay.

5 A But, yeah, those -- the first two are  
6 embarrassing, and I grew and learned from them.  
7 And I made a mistake, but that was over almost ten  
8 years ago. One of them was over ten years, and  
9 the one is almost going to be ten years next  
10 February.

11 MS. MURPHY: Okay. All right. Can I  
12 take those back? Thank you.

13 All right. And if you can just --  
14 hopefully I'm going to wrap up. Why don't we go  
15 off for five minutes. I'm just going to review my  
16 notes.

17 THE VIDEOGRAPHER: We are going off  
18 record at 3:19 p.m.

19 (Whereupon, a recess was taken.)

20 THE VIDEOGRAPHER: We are back on  
21 record at 3:24 p.m.

22 BY MS. MURPHY:

23 Q Russ, one of the things you talked about  
24 in your recorded statement was you being on the  
25 stack. And they asked you if you were aware of

1 any policy that said you couldn't -- standard  
2 operating procedure that you cannot be on an entry  
3 team until you've completed SWAT school.

4 As we sit here today, do you have any  
5 knowledge of that?

6 A That you can't complete entry unless  
7 you've completed the SWAT school? I had no  
8 knowledge of that, no.

9 Q Okay. And also, Russ, you talked about  
10 providing some screenshots of text messages  
11 between you and Lieutenant O'Daniel regarding  
12 getting authorization for this -- this -- this  
13 search warrant.

14 Did you ever provide those?

15 A I believe I gave them -- oh, God, it's  
16 been so long. I believe I gave them to the CIRT  
17 guys. It would have been Roth.

18 Q Okay.

19 A I think I gave them to him. I  
20 thought -- I thought I did. But I know that he --  
21 it's been so long, I can't tell -- I don't -- I  
22 thought I did is my answer. Yeah.

23 Q So, Russ, you talked about -- and quite  
24 a few people have talked about it.

25 One of the reasons to use the CET was an

1 incident where a guy kicked through an  
2 apartment -- the apartment stucco into another  
3 unit.

4 Do you remember talking about that?

5 A Can you -- refer a little bit more,  
6 please?

7 Q Sure. I'll read you a quick quote. And  
8 it's from page 42 --

9 A Okay.

10 Q -- of your statement. "I've seen it  
11 even in NV. Guys will kick through -- through the  
12 apartment stucco and go into the next apartment,  
13 and then we could create a potential hostage  
14 situation."

15 A Okay.

16 Q End quote.

17 A Okay.

18 Q Can you explain -- several of the SWAT  
19 guys have brought up that situation.

20 Can you tell me more about that?

21 A That situation or, like, are you  
22 implying, like, that we have seen that happen  
23 before on previous operations?

24 Q Yes.

25 A So -- and I think I'm referring to the



1 statement when I was in major violators as a  
2 detective, and I was also there as a sergeant.  
3 Any time that you have a wanted, armed individual  
4 that does not want to be apprehended or captured  
5 that's in an apartment complex or even sometimes  
6 in a condominium, where there's two different  
7 types of structures -- a townhouse -- you can  
8 see -- we have seen and we do know from our  
9 experience, and we have seen it live, where people  
10 will actually kick through an apartment wall to  
11 escape and go into another apartment or dwelling.

12 And you could potentially create a  
13 hostage situation with something like that,  
14 because they're trying to flee. They are armed.  
15 They have a gun. Those people don't know them.  
16 You don't know what that individual's mindset is  
17 going to be.

18 So that -- that -- that's a very, very,  
19 very critical piece there, to ensure that you try  
20 to avoid having that happen, because of those poor  
21 people that are there in that other residence.  
22 That's a safety issue. Especially when you know  
23 you're dealing with somebody that's got a  
24 propensity for violence, that's also committed the  
25 crime of murder or -- and we're looking for a

1 murder weapon and they're gang members, so --

2 Q In your -- so have you seen that more  
3 than one time?

4 A Oh, yes. I've seen somebody kick  
5 through a wall more than once, yeah.

6 Q How long does that take?

7 A Depends on how good they are and how --  
8 if they can tunnel through -- if they hit the  
9 studs, they might have to kick it again. Because  
10 you know how houses are built in Las Vegas or  
11 apartment homes. You -- usually they're -- you  
12 know, depending on how they frame it and, you  
13 know, how the walls are built -- I can't tell you,  
14 because I'm not in construction.

15 But, you know, if -- they can kick  
16 through and they can tunnel through anything. If  
17 someone wants to escape bad enough, they can get  
18 through -- they can create a hole and get through,  
19 especially skinny guys. They can -- they can  
20 really tunnel through some stuff and -- and create  
21 some serious havoc.

22 Q And so my question was -- if you know,  
23 you know; if you don't, you don't -- what's the  
24 fastest you have seen somebody tunnel through --  
25 kick through a wall?

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 122

1           A     I couldn't tell you how fast it took  
2     them, because I didn't know how -- I didn't -- I  
3     wasn't there to see them actually do it. But I  
4     can say that they can move ratherly [sic] quick if  
5     needed in order to escape and flee.

6           Q     Okay. I wanted to ask you really  
7     briefly about the second individual in the unit.

8                     Do you remember there being a second  
9     individual?

10          A     Yes, I do.

11          Q     And what happened with that individual?

12          A     As far as?

13          Q     Did you -- was it you who apprehended  
14     him, or somebody else?

15          A     I grabbed him off the wall.

16          Q     Okay.

17          A     I apprehended him.

18          Q     And as you sit here today, do you have  
19     any idea who he is?

20          A     No.

21          Q     Okay. Russ, I don't think I have any  
22     other questions.

23                     Russ, having -- now we've sat here for a  
24     couple of hours. Are there any answers that you  
25     have given today that you wanted to go back or

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 123

1 change or modify?

2 A No.

3 Q I've allowed you time to answer all of  
4 my questions; correct?

5 A Correct.

6 MS. MURPHY: All right.

7 MR. ANDERSON: No questions.

8 THE VIDEOGRAPHER: Okay. One moment.

9 This concludes the video-recorded  
10 deposition of Russell Backman taken on  
11 October 3rd, 2024. We are going off the video  
12 record, and the time is 3:30 p.m.

13 THE COURT REPORTER: Counsel, do you  
14 need a copy of the transcript?

15 MR. ANDERSON: Yes, please.

16 (Whereupon, the deposition  
17 concluded at 3:30 p.m.)

18 \* \* \* \* \*

19

20

21

22

23

24

25

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 124

## 1 CERTIFICATE OF COURT REPORTER

2 STATE OF NEVADA )  
 3 ) ss:  
 4 COUNTY OF CLARK )


5 I, Heidi K. Konsten, Certified Court Reporter  
 6 licensed by the State of Nevada, do hereby certify  
 7 that I reported the deposition of RUSSELL BACKMAN,  
 8 commencing on October 3, 2024, at 1:10 p.m.

9 Prior to being deposed, the witness was duly  
 10 sworn by me to testify to the truth. I thereafter  
 11 transcribed my said stenographic notes via  
 12 computer-aided transcription into written form,  
 13 and that the transcript is a complete, true and  
 14 accurate transcription and that a request was not  
 15 made for a review of the transcript.

16 I further certify that I am not a relative,  
 17 employee or independent contractor of counsel or  
 18 any party involved in the proceeding, nor a person  
 19 financially interested in the proceeding, nor do I  
 20 have any other relationship that may reasonably  
 21 cause my impartiality to be questioned.

22 IN WITNESS WHEREOF, I have set my hand in my  
 23 office in the County of Clark, State of Nevada,  
 24 this October 21, 2024.

25

  
 Heidi K. Konsten, RPR, CCR No. 845

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 125

1 DECLARATION OF DEPONENT

2 I, RUSSELL BACKMAN, deponent herein,  
3 do hereby declare under penalty of perjury that I  
4 have read the within and foregoing transcription of  
5 my testimony taken on October 3, 2024, at Las  
6 Vegas, Nevada, and that the same is a true record  
7 of the testimony given by me at the time and place  
8 hereinabove set forth, with the following  
9 exceptions:

10

11 ERRATA SHEET

12 PAGE LINE SHOULD READ: REASON FOR CHANGE:

13 \_\_\_\_\_

14 \_\_\_\_\_

15 \_\_\_\_\_

16 \_\_\_\_\_

17 \_\_\_\_\_

18 \_\_\_\_\_

19 \_\_\_\_\_

20 \_\_\_\_\_

21 \_\_\_\_\_

22 \_\_\_\_\_

23 \_\_\_\_\_

24 \_\_\_\_\_

25

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 126

	ERRATA SHEET			
	PAGE	LINE	SHOULD READ:	REASON FOR CHANGE:
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23	Date:			
24			RUSSELL BACKMAN	
25				

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>1</b>	<b>2</b>	<b>2:24-cv-00074</b> 5:18	<b>4</b>	<b>A</b>	115:3 116:25 117:23 118:9,23, 24 119:4, 20 122:7
<b>1</b> 6:12,13	<b>20</b> 8:24 81:5	<b>2:24-cv-00074-</b> <b>apg-njk</b> 4:16	<b>400</b> 4:12	<b>a.m.</b> 47:19	<b>above</b> 32:3
<b>10</b> 19:11	<b>2006</b> 15:6	<b>3</b>	<b>42</b> 119:8	<b>ability</b> 7:4 24:22 27:22 90:23	<b>absolutel</b> <b>y</b> 43:7 45:20 46:22 54:12 68:17 71:25 74:1 75:25 100:24 105:11
<b>10410</b> 4:24	<b>2010</b> 15:6		<b>45</b> 7:24	<b>able</b> 6:23 69:6 88:7 112:2,7	<b>access</b> 39:15 99:1
<b>10th</b> 20:9	<b>2015</b> 116:10	<b>3</b> 4:2	<b>4:00</b> 47:19	<b>about</b> 8:11 9:1 14:1 15:17 16:21 18:13 27:13 28:2 42:19 45:23 47:4 49:3,9 55:23 63:6 72:23 79:17 80:2,4 81:12 83:4 84:25 85:6,14, 17,20,22, 24 86:2 92:25 93:2 96:11 99:20 109:4,12, 14 110:12, 21,23 111:8,24 112:2 113:2 114:20	<b>absolute</b> 111:25
<b>11</b> 14:1	<b>2019</b> 11:14	<b>3.6</b> 92:7	<b>5</b>		
<b>1125</b> 47:10 62:8 92:15	<b>2021</b> 31:4	<b>3.8</b> 96:22 98:9	<b>5.5</b> 107:9 108:20		
<b>133</b> 81:10	<b>2022</b> 19:11 20:9 31:6	<b>3.9</b> 99:14 106:21	<b>6</b>		
<b>15</b> 81:5 99:4	<b>2024</b> 4:2,10 123:11	<b>3050</b> 62:8 92:20	<b>650-</b> <b>square-</b> <b>foot</b> 42:2 78:17		
<b>17</b> 115:6 116:1	<b>215</b> 92:8	<b>34</b> 62:16	<b>7</b>		
<b>18</b> 26:9,12 69:4 72:20 75:20 90:21 112:11	<b>216</b> 96:22	<b>35</b> 89:2			
<b>1997</b> 11:11	<b>218</b> 107:10	<b>3681</b> 7:9	<b>75</b> 8:10		
<b>1:10</b> 4:3,11	<b>220</b> 106:21	<b>3:19</b> 117:18	<b>8</b>		
<b>1:52</b> 55:11	<b>24/7</b> 97:14	<b>3:24</b> 117:21	<b>89112</b> 7:10		
<b>1:59</b> 55:14	<b>25</b> 56:6,8 58:20 59:17,22	<b>3:30</b> 123:12,17	<b>9</b> 56:8,12		
	<b>29</b> 19:21 50:13,14	<b>3rd</b> 4:10 123:11			
	<b>2:09</b> 66:13				
	<b>2:11</b> 66:16				



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>activated</b> 64:12	7:7 11:13 48:14	21 110:9, 23 113:8	<b>Alexander</b> 4:14 5:16,21	112:6,25 115:2,7, 12 117:11,13 123:3,6	62:16 72:3 73:11 81:2,13 82:15 86:8,11, 12 88:13 89:14,25 93:16,22 102:2 105:6 106:21 118:9 120:2,24
<b>actively</b> 78:5	<b>administe</b> <b>red</b> 39:4	<b>after-</b> <b>the-fact</b> 102:19	<b>alive</b> 68:20,23 69:7 110:19 112:3,6,9	<b>allow</b> 30:23 96:24 97:9 98:25 115:4	
<b>actual</b> 24:24 30:14 31:15 32:18 33:7 35:7 44:21 45:15,21 47:11,17 49:4,18 51:8 58:20 61:11 64:24 65:7 72:23 106:16	<b>administr</b> <b>ative</b> 69:21,25 113:12	<b>afternoon</b> 4:7,24	<b>all</b> 8:22 11:18 12:11 17:10 18:17 21:25 23:21 25:11 27:19,23 29:7 30:12 31:12 34:15 36:24 37:1,21 47:16 60:21 61:20 65:15 67:9,18 68:10 69:3,4 72:5 80:23 82:5,7 83:2,18 86:2 91:12 92:3,6 94:13 95:1 96:19 98:16 104:1 105:22 106:13, 14,15 107:5 109:9 110:19	<b>allow</b> 30:23 96:24 97:9 98:25 115:4	
	<b>admittanc</b> <b>e</b> 74:20,22, 24 78:13 79:12,13	<b>s</b> 26:8 83:13		<b>allowed</b> 123:3	
	<b>affect</b> 90:8,9	<b>again</b> 37:21 50:2 67:8 95:21,23 121:9		<b>allowing</b> 92:11	<b>altered</b> 107:2
	<b>affiant</b> 109:5,6	<b>agent</b> 15:25 109:6		<b>allows</b> 17:12	<b>although</b> 82:13 97:3
	<b>affidavit</b> 23:8 38:12	<b>ago</b> 14:25 66:23 68:4 117:8		<b>almost</b> 70:1 114:19 117:7,9	<b>always</b> 19:3 25:7,11 32:15 45:18 46:21 70:20 72:1,6, 13,16 95:18,19
<b>actually</b> 23:2 24:9 25:8 39:3 41:9 44:9 46:14,25 50:4,6 57:21 58:14,17 59:6,9 61:21 65:22 66:7 71:16 82:8 89:20 92:17 93:22,24 104:22 110:7 111:3 116:21 120:10 122:3	<b>after</b> 13:8,15, 16,18,24 14:2 18:19 26:8,14 27:14 29:10,20, 21 53:10 57:6,9 61:24 62:3 73:2,7,15 74:18 75:25 80:7,13 81:5,14 82:15 83:24 84:3,19 85:1 90:20 96:1,2 99:11 102:7,10,	<b>agree</b> 22:14,19 74:15 97:8 99:21 101:4			
		<b>ahead</b> 26:19 33:20,22, 25 34:3 35:16,17, 19 77:16 111:22		<b>along</b> 30:5 48:8	
		<b>akin</b> 40:16		<b>already</b> 19:19 102:23 112:14	
<b>addition</b> 54:23		<b>alarms</b> 28:23		<b>also</b> 9:5 13:13 24:25 28:17 29:4 30:4 36:12 37:23 38:1,11, 15 40:21 43:4 48:24 49:2 51:2 54:23 55:3,5 56:7 57:10,21 59:11 60:10 61:3	<b>ambush</b> 76:1 <b>ambushed</b> 75:19 <b>Amendment</b> 22:5,8,9 <b>amount</b> 18:10 19:7 20:11,14, 17 75:7 78:15 79:17,24 81:1,12, 15 82:22 85:15 92:14
<b>address</b>		<b>Alex</b> 65:12 76:21			

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

97:19	66:3	9:25	57:23	<b>apprehend</b>	<b>areas</b>
<b>amounts</b>	75:3,7	10:5,9	58:8	<b>ed</b>	97:6
90:4	88:17	11:17	69:13,21	120:4	<b>armed</b>
92:16	<b>announcem</b>	12:3	70:19,24	122:13,17	20:22
<b>analogy</b>	<b>ents</b>	14:13,22,	71:15,16	<b>approach</b>	24:22
96:13	24:7,9	23 15:10	79:15,21,	37:8	25:2
<b>Anderson</b>	29:1,21	16:10,13	23 87:16	<b>approache</b>	38:3,6,11
5:1 7:15,	83:18	20:13,14	93:12	<b>d</b>	40:6 42:4
18,22,23	88:11,15,	21:23	98:14	46:5	52:20
8:5 26:18	20,21	28:22,23	109:12,14	<b>appropria</b>	54:8
67:21	91:1	43:8,12,	110:12,21	<b>te</b>	57:7,8
70:12	<b>announces</b>	13 56:21	111:9	92:14	60:9
76:24	85:7	60:21	112:16	<b>approval</b>	62:14,16
77:15	<b>another</b>	68:15	121:16	23:12,15,	80:21
86:20	9:5	69:10,11,	<b>anyway</b>	19,24	92:13
111:21	39:20,21	20 70:3,	59:13	31:1,4	99:12
123:7,15	48:24	19 71:25	<b>apartment</b>	32:20	120:3,14
<b>Anderson'</b>	58:7	78:6,10	30:7,10	55:5,24	<b>armored</b>
<b>s</b>	96:21	79:10,11	42:1,2	56:11,13,	28:14
8:1	119:2	83:4	43:24	19,22	<b>arms</b>
<b>angle</b>	120:11	85:6,14,	44:4	107:14	20:21
58:23	<b>answer</b>	17 86:16	47:10,15	108:21	24:23
<b>angles</b>	17:13	87:15	52:11	<b>approvals</b>	25:22,23
76:17	18:11,22	88:7	60:9	56:3	27:22
<b>animals</b>	24:3	93:7,10,	64:24	<b>approved</b>	30:1
43:1	26:13,14,	11 95:19	66:4	23:17,21	40:19
<b>ankle</b>	15,19	107:21	78:17	52:1 95:5	<b>around</b>
38:16	27:18	108:24	92:15,17,	104:12	31:13
40:8	75:2	118:1,4	19 93:23	106:23	47:19
48:18	77:16	120:3	97:13	107:11	89:9
<b>announce</b>	96:25	122:19,	98:24	<b>approves</b>	91:13
16:3	97:10	21,24	99:1	51:25	<b>arrest</b>
17:6,7	112:21	<b>anybody</b>	111:15	<b>approxima</b>	39:5,7
18:6	118:22	68:15	119:2,12	<b>tely</b>	40:16,22,
21:11,12	123:3	74:1,5	120:5,10,	7:24	23 41:5,
27:7 28:1	<b>answered</b>	76:9,11	11 121:11	8:10,23	10,11,13,
29:21	71:11,17,	90:10	<b>apologize</b>	14:1	15,21
74:18	18	<b>anyone</b>	20:4	<b>AR-15</b>	<b>arrive</b>
77:14	<b>answering</b>	7:25	<b>appearanc</b>	39:20	47:18
<b>announced</b>	34:1	<b>anything</b>	<b>e</b>	52:21	49:1
78:19	77:23	7:3 8:16	<b>applied</b>	<b>area</b>	<b>arrived</b>
<b>announcem</b>	102:19	9:20,22	17:25	14:15,16	47:24
<b>ent</b>	<b>answers</b>	14:17	19:7	44:4	<b>articulat</b>
28:24	122:24	15:17	<b>applies</b>	58:24	<b>e</b>
	<b>any</b>	17:1	55:18		23:10
	6:22 7:2	28:22			
		35:4			

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>articulat ed</b>	88:6 92:21 94:21 96:5 98:4,10, 21 99:21 101:13 105:24 106:2,19, 25 107:15,23 108:7 109:11,18 110:6,13, 19,25 111:17,19 112:10 113:6 118:4 120:1,2 122:12,18	15:7 17:11 71:8 88:1 102:15,23 113:25 117:25	<b>associate d</b>	19,23 58:22 59:9 61:25 62:15 63:2 65:15,25 66:13,16 67:18 69:5,6 70:19 72:2,20 73:24 74:15 75:20,22 76:6 77:14 78:1,5 87:5 88:9 89:12 90:20,21 91:20 94:21,22 96:1 97:20 99:4,9,17 100:2,22 103:9,16 104:2,3, 23,25 107:1 108:4,17 109:2,22 110:4 112:3,10, 11,19,23, 24 113:15, 18,20 115:14 116:5 117:18,21 123:17	36:7,13, 20 37:6, 7,10 50:19 52:15
<b>as</b>	5:8,10 6:12,22 7:14 8:9 12:5,18 13:6,15, 20,22,25 14:14,23 15:9,19 16:18 17:1,22 18:2 20:7 21:2 22:13 27:1 29:5 30:3,22, 25 31:8 39:21 42:14 43:18 44:24 45:9,10, 12,19 46:3,15 48:11 49:3,6 51:6 52:5 53:14,15 54:16 56:9 57:5,6,23 60:13 62:23 64:16 66:21 70:21,24 71:3,4 72:3,4,23 77:5,12 78:3 79:18 86:9,14 87:14	<b>asking</b> 46:8 66:20 70:13 71:9,10 75:13 99:5 <b>asks</b> 115:6 <b>asleep</b> 78:8,9 <b>assault</b> 104:25 <b>assessmen t</b> 80:12 <b>assigned</b> 12:13 13:8,11, 12,14 14:2,13, 17 19:21 33:13 35:20 63:19,23 116:11 <b>assignmen ts</b> 35:8 49:2,5 <b>assist</b> 35:3,5,7 <b>assistant</b> 34:5,6,7, 12,18,23 <b>assisted</b> 50:25 57:18	<b>Associati on</b> 84:2 <b>assume</b> 11:15 12:17 44:24 60:15 <b>assumed</b> 109:19 <b>assuming</b> 6:5 31:19 91:24 <b>at</b> 4:12 11:12 13:1 14:3 15:16,21, 24 17:15 18:22 20:1 23:16,18 24:24 25:5 26:8,24 27:8,10 30:5,9,16 33:1,8 34:9 36:2,23, 24,25 37:1,7,9, 20 39:10 41:14,21, 24,25 42:5 46:7,13, 14,22,23 47:1,18, 24 52:2 55:11,14 56:23 57:3,4,	67:18 69:5,6 70:19 72:2,20 73:24 74:15 75:20,22 76:6 77:14 78:1,5 87:5 88:9 89:12 90:20,21 91:20 94:21,22 96:1 97:20 99:4,9,17 100:2,22 103:9,16 104:2,3, 23,25 107:1 108:4,17 109:2,22 110:4 112:3,10, 11,19,23, 24 113:15, 18,20 115:14 116:5 117:18,21 123:17	<b>attached</b> 28:25 <b>attempt</b> 58:24 <b>attend</b> 11:21 113:7,9 <b>attended</b> 113:4,11, 14 <b>attention</b> 59:5 <b>attorney</b> 5:20 <b>attorney- client</b> 7:19 <b>authority</b> 18:20 21:15 50:23 74:19 <b>authoriza tion</b> 31:1,4 118:12 <b>authorize d</b> 52:8 60:4 <b>automatic</b> 102:5 <b>automatic ally</b> 53:17,19 <b>avoid</b> 120:20 <b>awake</b>

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

75:22	70:2	45:25	52:14	83:12	48:9,11
76:12	72:1,22	<b>based</b>	53:13	85:25	52:5
77:13,18	73:25	15:2	54:2	86:1 96:3	58:15
78:8,9	74:7 79:5	20:18	63:17	98:18	60:1
<b>aware</b>	82:10,23	29:7	65:25	99:21	73:14
10:12	83:8,25	79:19	70:16	113:10	84:9 85:5
20:8 32:9	84:4	81:2 93:6	72:15,17	115:21	96:19
42:10	88:19	98:22	73:22	119:23	<b>better</b>
46:6 51:6	93:14	100:9	78:1 79:6	<b>beforehan</b>	10:21
71:19	95:21	101:12	80:13	<b>d</b>	41:1 72:3
82:2	101:3,17	104:1,3	81:22	46:18	87:20
86:17	103:9	106:3,6	90:8 91:4	68:2	95:18,25
87:16	104:14	108:4	98:3,19	<b>beginning</b>	102:1,9
88:8	113:10	<b>basic</b>	103:12,15	13:1,5	109:16
117:25	117:12,20	24:1	104:18	91:20	<b>between</b>
<b>awareness</b>	122:25	<b>basically</b>	105:25	<b>begins</b>	7:17 24:4
31:23,25	<b>backgroun</b>	14:12	106:13	4:8	27:6
<b>away</b>	<b>d</b>	28:11	109:3	<b>begun</b>	29:16,22
32:12	11:1	59:4	112:2,3,8	55:22	54:1 75:7
81:7,16	31:21	<b>Bates</b>	113:23,	<b>behalf</b>	118:11
89:13	<b>Backman</b>	89:2	24,25	4:25	<b>big</b>
	4:4,9	<b>bath</b>	114:5,8	<b>behind</b>	15:22
	5:7,15,	42:3	120:14,20	74:3	73:10
<b>B</b>	19,24,25	<b>bathroom</b>	121:9,14	<b>believe</b>	93:10
	11:3	82:3,11	122:2	8:8 18:12	<b>bike</b>
<b>B-A-C-K-</b>	123:10	<b>Bearcat</b>	<b>Beck</b>	19:4	93:9
<b>M-A-N</b>	<b>backwards</b>	28:25	4:18	32:21	<b>bit</b>
5:25	12:24	67:6	<b>become</b>	38:18,19	19:25
<b>back</b>	<b>bad</b>	<b>Bearcats</b>	32:18	44:3	20:6 21:7
13:17,18,	34:24	28:13	90:17	50:25	31:14
23,25	72:10	52:12	<b>bedroom</b>	69:4 70:1	41:1
14:4 30:3	110:14	62:4,7	42:3	118:15,16	51:18
31:4	121:17	64:4,7,	78:18,19	<b>believed</b>	63:11
32:22	<b>ballistic</b>	22,23	<b>before</b>	82:14	76:3
36:22	62:12	65:2	6:20	<b>belt</b>	79:16
37:3	<b>bang</b>	<b>because</b>	25:22	62:13	80:2,3,10
40:13,25	56:8,12,	14:5	35:21	<b>Bertuccin</b>	87:7,20,
44:25	14,19	18:13	40:8 41:3	<b>i</b>	21 91:5,
49:6 50:5	59:14,15,	23:2	43:3 45:6	9:6,11	14 99:20
51:18	18,20	29:12,14,	51:14	<b>Bertuccin</b>	115:4
55:13	<b>Banks</b>	24 33:6	54:6	<b>i's</b>	119:5
56:1 59:5	81:7	35:24	55:18	9:19 10:4	<b>blinds</b>
60:25	<b>Bar</b>	40:18,25	60:5	<b>best</b>	45:25
61:15,19	4:24	41:25	63:14,23	6:24	<b>bodies</b>
63:10	<b>barricade</b>	47:15	68:9		114:1
65:14			78:11,24		
66:1,15			79:8 80:2		
68:21			81:23		

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>body</b> 64:10,12, 17,22	20,25	<b>bunch</b> 20:24	85:21 86:12 87:6,14 88:21 90:4 91:14 92:3 94:19 95:17 103:7 106:2 107:21 110:19 116:22 117:5,7 118:20 121:15 122:3	85:18	113:11
<b>boom</b> 59:23	<b>Brice</b> 65:11	<b>bureau</b> 116:11		<b>call</b> 11:2,4 25:9,11 40:11 73:16 74:2,6 96:12 100:1,2, 19,23 103:8,17 114:24	<b>cameras</b> 64:12,13, 22
<b>boss</b> 94:24	<b>brief</b> 13:23 40:24 49:6	<b>burned</b> 44:3			<b>cams</b> 64:10,18
<b>both</b> 11:10 18:2,5 19:15 28:16 34:9 39:16 40:2 48:20 60:12 83:5 87:2 98:6	<b>briefed</b> 47:22,23	<b>but</b> 6:11 7:21 13:20 18:24 21:3,7 23:17,20 24:2,14 25:8 26:10 28:6 29:14 31:8,14 32:2,10 35:23 37:23 38:22 39:2 40:7,13, 22 41:9 42:10 44:12,16 47:5,9 49:25 50:11,16 51:1 52:14 55:17 59:12,20 63:12 65:15 67:22 68:19,22 69:17 71:10,11 72:3 73:11 76:10 77:21 78:7,23 80:2,10 82:12 83:10,12	<b>by</b> 5:13 6:14 9:6,9,12 19:10 23:9,17, 24 26:21 32:3,7,19 34:10 39:21 43:13,17 45:4 55:15 66:18 67:5,11, 24 71:7 77:1,19 86:17,23 99:17 101:5 103:14 106:23 112:4,12 113:20 117:22		<b>cannot</b> 118:2
<b>Boulevard</b> 92:21	<b>briefing</b> 39:10 41:2,4 48:6,10, 12,13 49:4 61:22,25 62:3				<b>Capital</b> 85:7
<b>brass</b> 46:11,12 73:8 96:5,9 101:25 102:8,21 105:10	<b>briefly</b> 116:3 122:7				<b>captain</b> 23:18 83:24 84:4 108:20
<b>brass-</b> <b>wrapped</b> 101:23	<b>bring</b> 9:25 37:3				<b>captured</b> 120:4
<b>breach</b> 57:16 101:6,8 102:10,17 112:15	<b>bringing</b> 69:1				<b>career</b> 15:3 116:15
<b>breaching</b> 29:10 46:15 65:8	<b>brings</b> 68:21			<b>call-outs</b> 83:17	<b>case</b> 4:13,15 5:18,21 15:24 16:21 26:4 28:6 29:2 30:2 44:20 49:8 77:10 80:9,25 81:4,9 82:12 90:16 98:10 104:19 105:4 109:6
<b>break</b> 55:9,16, 18 61:7, 8,14 67:13,18,	<b>broken</b> 75:8			<b>called</b> 5:8 13:19 47:6 54:24 56:7 64:1 74:12 89:16 103:2,3	
	<b>brought</b> 53:12 93:14 119:19			<b>calling</b> 73:24	
	<b>building</b> 64:24			<b>calls</b> 108:15	
	<b>buildup</b> 43:20			<b>came</b> 32:10 35:21 44:3 64:10 68:22 70:22 83:24 97:22 109:9 112:2	
	<b>built</b> 121:10,13				<b>cases</b> 46:21 53:6
	<b>bullhorn</b> 49:14 66:5 88:12		<b>C</b>		<b>cause</b> 40:23 41:5,6 89:12
			<b>C-E-T</b> 15:14 25:8,9,10		

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

90:17	<b>cetera</b>	<b>circumsta</b>	77:11	20:25	<b>communica</b>
104:20	48:22	<b>nces</b>	<b>cleared</b>	35:11	<b>tions</b>
<b>cell</b>	<b>CETS</b>	80:15	61:16	36:7,22	52:7
37:19	60:21	82:14,22	<b>clearing</b>	69:7 84:4	<b>complaine</b>
82:18	83:17	98:23	57:18	97:24	<b>d</b>
<b>certain</b>	85:6	<b>CIRT</b>	<b>Clements</b>	103:25	116:24
42:18	<b>chain</b>	8:7,15,17	65:11	109:12	<b>complaint</b>
43:2	23:13,22	9:13	<b>Clements'</b>	<b>comes</b>	116:16
45:22	<b>chance</b>	81:10,12	76:22	35:4	<b>complaint</b>
51:15	77:7	91:15,21	<b>close</b>	76:11	<b>s</b>
64:16,19	<b>change</b>	92:10	89:6	80:10	115:3,7,
71:18	70:7,8,24	93:6 98:6	99:19	89:15	11
79:24	71:5,15	107:10	106:24	101:10	<b>coming</b>
94:14	123:1	108:10	<b>closed</b>	66:24	<b>complete</b>
108:10	<b>changed</b>	118:16	74:23	70:2	9:3 118:6
<b>certifica</b>	31:9 71:9	<b>cite</b>	75:1 79:9	78:20,22	<b>completed</b>
<b>tion</b>	101:18	<b>cited</b>	<b>clothing</b>	79:10	118:3,7
16:11,16,	105:3	81:9	37:18	86:18	<b>complex</b>
18,23,25	<b>charge</b>	<b>cites</b>	<b>club</b>	90:24	30:7,8,10
<b>CET</b>	49:16,17	98:10	12:6,7	91:8	42:1
14:22	50:7	<b>citizen</b>	<b>cocaine</b>	108:7	120:5
15:9	<b>chief</b>	115:3,7,	81:7,16	<b>command</b>	<b>compliant</b>
25:11,13,	23:22	11 116:16	82:3	14:15	90:18,19
16,25	<b>children</b>	<b>citizens</b>	<b>code</b>	23:13,22	<b>comply</b>
26:16,22,	43:6	86:9,13	18:16	51:10	83:5
24 27:2,	92:18	<b>civil</b>	<b>codefenda</b>	<b>commander</b>	<b>concerns</b>
7,23	93:5,13	22:16,20	<b>nts</b>	31:2	82:19
29:16	<b>children's</b>	<b>clarifica</b>	10:10	56:24	<b>concluded</b>
30:3,5,	93:11	<b>tion</b>	<b>Cole</b>	107:15	92:10
19,23	<b>chose</b>	70:15	83:24	<b>commands</b>	98:7
31:10	112:9	<b>clarify</b>	84:4	14:16	107:10
51:16,20,	<b>chronolog</b>	70:12	108:20	<b>comment</b>	123:17
21,23,25	<b>ical</b>	71:12	<b>Cole's</b>	80:10	<b>concludes</b>
52:8	116:14	79:6 80:9	85:7	107:19	94:10
54:21,23	<b>chronolog</b>	91:19	<b>college</b>	<b>committed</b>	123:9
60:16,21	<b>ically</b>	<b>clean</b>	11:20,22	120:24	<b>conclusio</b>
63:12,14	12:25	94:20	<b>combinati</b>	<b>communica</b>	<b>n</b>
84:4	<b>chronolog</b>	<b>clear</b>	<b>on</b>	54:19	96:22
85:18,19,	<b>y</b>	21:17	89:3	<b>communica</b>	98:2
20,24	15:2	57:13,16	<b>come</b>	<b>ting</b>	99:13,14
86:11		58:24	10:19	50:17	107:9
92:12,21		61:10	18:10,11		108:10
97:4		71:4,21			109:9
99:15					
101:5					
106:22					
107:2					
118:25					

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>conclusions</b> 8:23 91:15 92:4 94:14	<b>consistent</b> 81:19,21	<b>cops</b> 112:5	17 89:25 90:18 91:22,23 93:17,24 99:25 101:20 104:9,10 107:7 108:1,8 109:23 111:4,14 113:4,5 123:4,5	5:3 6:11 9:8 32:4 34:8,17 123:13	<b>custody</b> 25:21 29:20 59:7 89:21
<b>conditions</b> 96:23	<b>constitutes</b> 85:15	<b>corner</b> 75:18 78:2		<b>cover</b> 57:21 74:7 113:3	<hr/> <b>D</b> <hr/>
<b>condominium</b> 120:6	<b>constitutional</b> 21:17,23 22:16,20	<b>corners</b> 28:16		<b>covered</b> 114:19	<b>DA</b> 23:24
<b>conduct</b> 22:15 33:13 92:12	<b>construction</b> 121:14	<b>correct</b> 10:24 14:5,8 17:16,18 19:4 23:4 24:17 28:8 30:19,24 31:11 33:3 36:4,9,10 38:17,24 39:9 40:8,9, 11,12,16 41:10,18, 19,22 42:11 47:18 50:17,24 51:10 54:10,21 55:20 58:10 60:18 63:14,24 70:11 73:1 75:16 77:22 79:22 80:6,14 81:18,24, 25 82:17, 19,24 84:18 87:4 88:3,14,	<b>correctly</b> 32:24 63:21 107:20	<b>Craig</b> 5:1 18:18 70:15	<b>dad</b> 112:4
<b>conducted</b> 43:13	<b>contacting</b> 50:22		<b>Corrine</b> 4:24 5:19	<b>crazy</b> 82:5	<b>dads</b> 112:6
<b>conducting</b> 46:24	<b>contain</b> 30:13 52:11,17 83:23		<b>Corvel</b> 38:18 39:25 48:17 109:20	<b>create</b> 119:13 120:12 121:18,20	<b>danced</b> 31:13
<b>conference</b> 84:5	<b>contained</b> 92:11		<b>couch</b> 75:15	<b>crime</b> 20:19 57:9 116:11 120:25	<b>dangerous</b> 54:9 92:13
<b>confidential</b> 7:19	<b>containment</b> 28:13,16, 19		<b>counsel</b> 4:21 123:13	<b>crimes</b> 14:18,19 106:15	<b>date</b> 4:9 84:6, 8
<b>confirm</b> 55:17 82:12	<b>control</b> 15:14		<b>couple</b> 18:14 36:3 39:13 44:17 68:4 76:18 93:1 122:24	<b>criminal</b> 13:14,16 40:3 48:16 116:11	<b>dates</b> 43:21,25
<b>conflict</b> 27:6	<b>controlled</b> 15:15,16 25:14,17, 19 29:18 30:20		<b>course</b> 18:24 19:10 36:14 46:2 114:17	<b>critical</b> 120:19	<b>Dawn</b> 4:18
<b>confuse</b> 89:25				<b>crosstalk</b> 108:11	<b>day</b> 10:18 19:7,10 32:1 33:9 51:2,14 54:6 70:22 74:13
<b>confused</b> 70:17 86:17	<b>conversation</b> 60:1,2			<b>CSN</b> 11:23	<b>day-to-day</b> 35:3
<b>consideration</b> 43:5 72:6	<b>cool</b> 11:4		<b>court</b> 4:17,19	<b>current</b> 12:11	<b>days</b> 19:21 31:17 44:13 50:13,14
<b>consist</b> 65:6				<b>currently</b> 11:6,16 14:3	<b>dead</b>



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

76:9,12	<b>degree</b> 11:24	<b>describe</b> 59:20	<b>devices</b> 54:25 55:23	<b>dis</b> 58:20	<b>disorient s</b> 58:13
<b>deadly</b> 104:25	<b>delayed</b> 101:11	<b>descripti ons</b> 29:13	<b>Di</b> 7:9	<b>disagree</b> 97:8 101:4	<b>distract</b> 55:7,23 56:5,8,17 58:3,20 59:4,15 60:24 89:11,12
<b>dealers</b> 53:3 54:3 97:16	<b>departmen t</b> 4:15 5:17 13:7 70:13 86:6	<b>destroyed</b> 81:17 82:17,18	<b>dialogue</b> 64:6	<b>disagreed</b> 9:22	
<b>dealing</b> 120:23		<b>destroyin g</b> 25:22	<b>dictate</b> 27:18	<b>discovery</b> 114:21	
<b>debatable</b> 95:11	<b>depending</b> 15:22 24:14 25:1 27:15,19 29:2 62:25 63:1,2 73:10 121:12	<b>detail</b> 106:10	<b>differenc e</b> 24:4 29:16,22 45:7,9 53:25	<b>discretio n</b> 107:11	<b>distracti on</b> 54:24,25
<b>deceased</b> 72:9		<b>detailed</b> 31:18,19, 20	<b>different</b> 14:16 20:24 21:3 23:19 44:14 46:4 50:23,24 80:11 90:5 91:6 95:13,14 103:18 116:4 120:6	<b>discuss</b> 6:16	<b>distracts</b> 56:3 59:17 86:17 88:13,16 89:10
<b>December</b> 114:5,7		<b>details</b> 106:15		<b>discussed</b> 7:17 10:8 91:20 112:14	
<b>decision</b> 92:20 108:4	<b>Depends</b> 121:7	<b>detective</b> 13:15,21 15:25 23:9 40:5 44:19 45:4 120:2		<b>discussin g</b> 54:20	<b>District</b> 4:17
<b>decisions</b> 109:3	<b>deploying</b> 89:24			<b>discussio n</b> 85:14,17	<b>documente d</b> 39:16,17 40:2 48:20 54:16 57:11
<b>deem</b> 26:2 29:24	<b>deposed</b> 16:21	<b>detective s</b> 29:8 38:8 40:22 41:14 43:11,17 48:8 49:7 94:1 111:6	<b>different ly</b> 19:25 20:6 72:11 87:7 90:9,10 102:16 104:8 112:17	<b>discussio ns</b> 85:19,20	<b>documents</b> 10:1
<b>deep</b> 58:6 75:18	<b>depositio n</b> 4:4,9 5:15 6:7, 19 7:13 8:2,6 9:4,16,19 10:4,6,9, 19 17:14 68:6 91:20 93:2 114:23 123:10,16	<b>detonatin g</b> 88:13		<b>disembark ed</b> 65:2	<b>dogs</b> 43:6 45:14 48:22
<b>Def</b> 56:6 59:22		<b>device</b> 54:24 55:7 58:3,19 59:3,16 61:10	<b>directed</b> 115:9	<b>disorient</b> 58:4,10 61:2	<b>doing</b> 35:1 43:3,23 44:2 47:11 49:3 50:16 72:11 89:19,21 101:5
<b>defendant</b> 115:8 116:18	<b>depth</b> 58:20		<b>directly</b> 69:6 76:6 84:19	<b>disorient ate</b> 58:12 59:4 89:18,20 90:13	
<b>defendant s</b> 5:2	<b>deputy</b> 23:22			<b>disorient ates</b> 58:12	
<b>defensive</b> 75:18					
<b>definitel y</b> 102:1					
<b>definitio n</b> 90:2					



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>done</b> 15:21 23:2 33:2,10 34:1,2 35:9 43:19 51:16 63:13,16 95:25 97:4 105:19 112:16,17	36:6,13 48:15 50:18 74:9 102:3 <b>drafted</b> 105:15 <b>draw</b> 48:23,24 59:5 64:14 65:15 <b>drawings</b> 48:4,5 <b>draws</b> 37:4 <b>dressed</b> 62:6 <b>drew</b> 94:13 <b>drinking</b> 14:6 <b>drive-by</b> 105:9 <b>drug</b> 54:2 <b>due</b> 52:12,22 54:11 <b>DUI</b> 14:5 116:10 <b>duly</b> 5:8 <b>dump</b> 82:3 <b>during</b> 15:5 48:17 85:7 104:6 <b>duties</b> 14:24	<b>duty</b> 22:15,21 78:21,23 <b>dwelling</b> 25:20 120:11 <b>dynamic</b> 29:18 64:3 <b>dynamical</b> <b>ly</b> 25:20 26:2,5,6, 11,17 <hr/> <b>E</b> <hr/> <b>each</b> 7:24 28:18 39:16 90:5 <b>earlier</b> 44:7 79:6 82:24 93:1 94:4 97:5 <b>early</b> 15:3 <b>educated</b> 19:18 <b>education</b> 11:19 <b>effects</b> 89:4 <b>eight</b> 45:2 <b>either</b> 12:25 28:15 32:24 78:8,9 93:17 109:5,19	110:8 <b>elderly</b> 42:25 43:6 92:18 93:5,15 <b>element</b> 46:16 65:8 74:17 101:8 <b>elements</b> 82:23 83:4 99:15 101:5 <b>else</b> 7:25 8:5, 16 65:20 74:5 110:12,21 112:16 122:14 <b>else's</b> 114:11 <b>email</b> 32:11 <b>embarrass</b> <b>ing</b> 116:5,9 117:6 <b>emits</b> 58:11 <b>emotions</b> 68:22 69:1 <b>employed</b> 58:18 <b>encounter</b> 42:7,8 72:18 <b>encounter</b> <b>ed</b> 72:20	<b>end</b> 92:24 97:1 105:17 119:16 <b>enlighten</b> 49:8 <b>enough</b> 32:16 121:17 <b>ensure</b> 120:19 <b>entailed</b> 48:10,12, 13 <b>enter</b> 21:18 24:9 25:19 <b>entered</b> 26:16 75:19 <b>entering</b> 24:7 99:19 <b>entire</b> 8:20 <b>entitled</b> 4:14 7:18 <b>entries</b> 14:22 15:9 16:6,23 <b>entry</b> 15:15,16 25:14,17, 19 26:10, 12,17,22 27:2 29:18 30:20 42:17 50:21 59:4	60:22 78:3 83:6,7 86:5 101:20 118:2,6 <b>environme</b> <b>ntal</b> 30:4 36:25 52:12 <b>equipment</b> 62:6,9,11 <b>escape</b> 120:11 121:17 122:5 <b>especiall</b> <b>y</b> 120:22 121:19 <b>essential</b> 25:25 <b>essential</b> <b>ly</b> 23:6 35:15 56:8 59:15 60:18 63:25 <b>establish</b> 28:16 <b>establish</b> <b>ing</b> 28:13 <b>et</b> 48:22 <b>et al</b> 4:14,15 5:16,17 <b>even</b> 18:18 32:12
---	---	---	--	---	---

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

63:22	82:15	<b>execution</b>	97:2	50:3	<b>feel</b>
68:3	<b>exact</b>	51:9,11	<b>extremely</b>	60:15	28:8
106:17	27:18	111:18	24:21	62:20	72:10
109:25	28:20	<b>exhibit</b>		70:15	110:14
113:25	43:25	6:12,13	<b>F</b>	75:14	<b>feeling</b>
119:11	69:16	<b>exigency</b>		87:6	87:23,25
120:5	84:6,8	20:18	<b>facilitat</b>	90:16	<b>felony</b>
<b>event</b>	88:20	21:5	<b>e</b>	92:4,5	104:23
71:25	108:16	<b>experienc</b>	51:15	100:15,16	<b>felt</b>
<b>ever</b>	<b>exactly</b>	<b>e</b>	<b>fact</b>	112:20	39:8
6:19	35:25	52:25	52:22	<b>fairly</b>	<b>few</b>
33:24	36:16	53:22	58:10	81:6	35:23
63:18	44:18	79:19	93:6 96:2	<b>familiar</b>	46:4
113:7	61:16	97:2,14	102:11,21	32:18	118:24
118:14	104:17	120:9	110:9,23	<b>family</b>	<b>figure</b>
<b>every</b>	<b>EXAMINATI</b>	<b>explain</b>	111:1	72:10	36:15
13:6	<b>ON</b>	15:13	113:8	110:15	<b>figured</b>
113:21	5:12	17:5 21:6	<b>factors</b>	<b>far</b>	32:2
114:4	<b>examined</b>	34:21	27:23	7:14 12:5	<b>fill</b>
<b>everybody</b>	5:9	41:16	30:4,12	14:14	114:10
28:21	<b>example</b>	42:23	36:25	16:18	<b>final</b>
48:5	16:19	116:3	52:12	17:1 18:2	8:17
49:6,8	81:3	119:18	92:16	21:2 30:3	<b>find</b>
64:10,11,	<b>Except</b>	<b>explained</b>	94:14	31:20	10:23
12,20	93:25	52:10	<b>facts</b>	45:10,12	74:8
85:13	<b>excerpt</b>	60:5	31:15,22	46:15	<b>Findley</b>
86:3,5	81:4	98:17	96:20	57:5	33:8
90:12	<b>everybody</b>	113:24	97:21	70:24	49:17
94:16	<b>'s</b>	<b>explanati</b>	105:22	96:5	50:6
<b>everyone</b>	<b>excuse</b>	<b>on</b>	106:13,	105:24	103:15
65:19	58:12	53:7	14,19	107:23	<b>firearm</b>
<b>everything</b>	102:24	108:16	108:3	108:7	116:8
<b>g</b>	<b>execute</b>	<b>explanato</b>	109:9	122:12	<b>firearms</b>
7:12 28:9	55:4	<b>ry</b>	<b>failed</b>	<b>fast</b>	37:17
72:15	71:14	24:2	112:11	76:13	42:12
74:11	111:1	<b>explosive</b>	<b>failure</b>	78:4	80:22
94:23	<b>executed</b>	16:5,23	92:22	122:1	<b>fired</b>
95:2	39:4	101:19	94:10	<b>fastest</b>	26:12
105:24	107:6	102:10,	111:20,25	121:24	<b>firing</b>
114:19	<b>executing</b>	15,17	112:10	<b>February</b>	78:3
<b>evidence</b>	41:10	112:15	<b>fair</b>	117:10	<b>first</b>
25:22	54:6	<b>extend</b>	11:15	<b>federal</b>	5:8 21:22
81:14	107:3	58:21	12:17	17:8	22:9
	109:23	<b>extensive</b>	32:8,16	18:1,8,9	
			44:23	19:2,3,15	

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

31:23,25 61:12 63:18 97:3 115:20 117:5 <b>firsthand</b> 111:10,13 <b>Fisher</b> 38:18 39:25 48:18 109:21,22 <b>five</b> 13:13 65:13 73:15 82:1 103:12 117:15 <b>flash</b> 69:6 76:7 <b>flee</b> 120:14 122:5 <b>fleeing</b> 60:25 <b>flexing</b> 100:4,10 103:24 <b>flexion</b> 100:5 <b>flip</b> 115:20 <b>flood</b> 26:1 <b>flooded</b> 26:4 <b>flophouse</b> 38:10 40:6,11 43:15 52:24,25 53:17	80:20 97:13 <b>flush</b> 81:7 82:4 <b>flushed</b> 81:16 <b>focus</b> 11:25 <b>Follow</b> 35:18 <b>follow-up</b> 14:14 <b>following</b> 69:11 <b>follows</b> 5:10 <b>for</b> 4:22 5:1, 23 7:8,13 8:1,5 9:4 11:8,15 12:17 13:17,23 14:1 15:4,12 16:12,13, 23 17:13, 14 18:2, 10,19 19:17 23:11,13, 14,15,16 24:3,20, 25 25:24 27:16 29:1,5,15 30:17,23, 24 31:4 32:8 33:16,18 34:15 36:3,8 37:12,17 38:22 39:1 40:3,7	42:12,14 43:5 44:21,23 45:2,16, 18,24 47:14 49:13,20 50:3,11, 12,23 51:1,23 55:3,24 56:4 57:2,21 60:10,15 61:13 64:16 65:15 66:4 68:6,10, 16,25 69:2,15, 24 72:10, 13 73:23 74:18 75:5 79:21 81:3,8, 15,23 82:1 83:1,5 89:17 92:11,12 93:25 94:20 96:16 97:3,10 99:8 102:1,2 103:10 104:13,20 107:14 108:21 110:15 112:18 114:22,25 115:6 116:4,21 117:15 118:12 120:24,25	122:23 <b>forget</b> 69:16 <b>Form</b> 26:18 77:15 86:20 111:21 <b>formulate</b> 74:9 <b>formulate</b> <b>d</b> 35:13,14 <b>formulati</b> <b>ng</b> 37:4,10, 11 <b>fortify</b> 20:22 <b>fortunate</b> 69:9 <b>found</b> 116:8 <b>four</b> 65:12,21 70:1 84:18 115:11, 23,24,25 116:1 <b>Fourth</b> 22:5,8 <b>frame</b> 84:9 121:12 <b>free</b> 28:8 <b>Freedom</b> 22:11 <b>from</b> 8:1 9:15 13:10,11 14:18	21:9 23:12 29:3,8 31:1 37:8 38:1,21 39:18,21 44:3 52:15 53:21 55:5 56:11,23 60:25 72:6 73:8 74:9 75:24 76:12,16 80:22 81:4,9 83:25 89:1,3, 11,14,15 91:7 95:19 96:22 97:14,24 98:9 99:23 100:17 102:19 106:21 107:9 108:7,9, 19 109:6 110:20 117:6 119:8 120:8 <b>front</b> 28:15 46:22 57:17 65:23 78:18 86:2,4 93:9 100:19 102:4 103:8,17, 20	<b>full</b> 5:22 <b>functioni</b> <b>ng</b> 35:1 <b>functions</b> 36:16 <hr/> <b>G</b> <hr/> <b>gain</b> 99:1 <b>gang</b> 38:1 39:16,17, 22 40:2 43:15 48:20 54:16 57:11 80:19 97:16 104:20 105:8 121:1 <b>Garth</b> 33:8 51:2,6 <b>gas</b> 72:14 <b>gather</b> 75:25 <b>gathered</b> 52:15 <b>gathering</b> 61:1 <b>gave</b> 31:16 53:7 66:3 68:1 78:14 87:8 88:11 91:1
---	--	---	--	---	--

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

101:13, 20,21 116:13 118:15, 16,19 <b>general</b> 12:1 <b>generally</b> 24:19 <b>gentleman</b> 16:22 72:9,20 <b>gentlemen</b> 16:20 <b>get</b> 6:11 23:12 24:11 28:7 29:8,23 30:25 31:3,21 32:11 34:17 35:6 36:8 46:22 47:17 50:23 60:3,23 64:4,7,24 72:3 75:5 89:18,21 92:1 95:18 100:6 102:3 121:17,18 <b>getting</b> 29:3 33:9 51:15 52:8 72:25 73:5 100:5 103:23 110:4 118:12	<b>Girolamo</b> 7:9 <b>give</b> 6:24 16:19 17:12 18:5 28:23 29:1 37:6 45:18 64:6 66:9,10, 24 72:14 83:20 84:4,8,9 88:7 90:15 98:1,5 103:11 108:16 <b>given</b> 6:19 9:6 15:2 29:13 38:7 92:14 109:5 122:25 <b>glad</b> 17:11 53:12 68:22 <b>GLOCK</b> 62:16 <b>gloves</b> 62:13 <b>go</b> 12:25 23:1 26:19 29:4,9 32:12 33:13,20, 22,25 34:3 35:15,17, 19,20	36:22,23 37:21 42:14 56:1 58:4 59:6 64:20 66:10 69:7 70:20 71:2 72:1,18 77:7,9,16 79:5 83:19 105:1 111:22 112:7,25 114:23 117:14 119:12 120:11 122:25 <b>God</b> 118:15 <b>goes</b> 23:15 56:9 59:23 63:10 77:10 82:23 83:10 87:2 <b>going</b> 9:9 10:25 15:8 17:8 23:3 27:15 29:19 31:13,14, 19,20 35:8 36:8,18, 20 39:7 41:15 42:20 45:17,19 47:16	48:14 49:1 50:4,19 53:1,10, 18 54:4 55:8,10 57:6,9 58:5,14 59:2,13 60:25 64:5 66:12 72:17 74:5,8 77:8,9,10 78:12 79:5,12 80:7,13, 24 81:14, 23 82:15 88:16,19, 23 91:13, 14,17 92:6 94:18 95:13 96:12,21 99:10 100:6 101:3,8 102:7,23, 24 103:16 112:25 114:18 115:2,3 117:9,14, 15,17 120:17 123:11 <b>gone</b> 9:18 14:4 21:7 35:22 111:1 <b>Gonzalez</b> 65:12 <b>Gonzalez'</b> <b>s</b>	76:21 <b>good</b> 4:7,23 17:10 29:13 46:22 67:14 121:7 <b>gosh</b> 19:20 69:16 <b>got</b> 10:18 26:8 29:11 33:5,12 46:15 55:23 56:3 57:19,23 59:19 62:6,7 65:2 69:5 73:15 94:1 101:1 108:2 110:15 112:3 115:22 116:7 120:23 <b>grab</b> 58:8 <b>grabbed</b> 122:15 <b>grew</b> 117:6 <b>grind</b> 80:3 <b>groundwor</b> <b>k</b> 17:13 <b>guess</b> 16:1	44:16 64:19 102:18 <b>guideline</b> 79:20,24 <b>gun</b> 53:11 76:6 82:17 120:15 <b>guns</b> 53:1,4,18 54:5 62:15 <b>guy</b> 78:4 119:1 <b>guys</b> 35:6,8,20 37:5 41:3,9 42:14 46:14 47:21 48:4 52:15 57:20 61:24 65:16 68:20 93:21 99:1 100:19,21 103:7 117:3 118:17 119:11,19 121:19 <hr/> <b>H</b> <hr/> <b>hadn't</b> 94:3 <b>half</b> 69:19 90:11
---	--	---	--	--	--

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>hallway</b> 30:11	40:19 53:15	62:12	95:3,22 96:16 103:16,21	<b>hood</b> 58:19	69:15,24 70:7,8
<b>Hancock</b> 65:9	63:4 74:10,21 89:9 97:2	<b>help</b> 59:3 60:22	<b>hide</b> 79:3	<b>hopefully</b> 117:14	71:13,14, 20 72:3 73:10
<b>hand</b> 101:11 115:19	101:12 102:4,21 110:20	<b>helping</b> 51:14	<b>high</b> 58:23 105:8	<b>hopped</b> 46:25 47:9	75:11 77:23 83:10,19 84:3
<b>handguns</b> 63:4	111:1 112:15 120:20	<b>Henderson</b> 7:9 11:7, 9,13	<b>highest</b> 11:18	<b>Hoskins</b> 65:8	88:20 94:13 97:17
<b>hands</b> 67:4	122:23	<b>here</b> 6:9,16,22 9:15 10:1,9,13 11:8 17:9 20:7 27:1 30:3,22 31:8 43:18 44:24 46:3 48:11 52:6 66:6 67:4 70:8 77:12 79:18 87:14 88:6 96:23 98:21 99:21 103:10 106:2,25 109:11,18 110:6,13, 16,25 111:17,24 112:1 113:6 115:22 118:4 122:18,23	<b>highlight ed</b> 115:16	<b>hostage</b> 21:2 71:1 119:13 120:13	109:8 113:18 116:22 121:6,7, 10,12,13 122:1,2
<b>happen</b> 78:24 112:9 119:22 120:20	<b>havoc</b> 121:21		<b>hindsight</b> 46:6 112:17	<b>hour</b> 55:9	
<b>happened</b> 61:24 70:8,10 95:23 96:3 112:24 122:11	<b>head</b> 14:7 71:4		<b>histories</b> 48:16	<b>hours</b> 45:2 68:4 122:24	<b>However</b> 103:14
	<b>heading</b> 62:8 64:9		<b>history</b> 40:3 48:19	<b>house</b> 28:15 30:8,9,14	<b>human</b> 68:14 72:8 111:23
	<b>headway</b> 103:23		<b>hit</b> 32:1 69:5 100:4 121:8	<b>houses</b> 121:10	<b>hung</b> 57:19,23 60:23
	<b>health</b> 70:4		<b>hits</b> 73:15 103:12	<b>how</b> 7:16,21, 22 8:14 11:8,12 15:1,19, 22 17:13 23:2 24:14 27:16 35:1,11 36:18,20 37:7 42:5,9 43:19 44:8,9,18 48:25 50:11 53:2 54:3 58:17 59:20 61:16 66:1	
	<b>hear</b> 53:16 79:15 84:25		<b>hitting</b> 99:18		
	<b>heard</b> 63:18,22		<b>hole</b> 121:18		
	<b>heavily</b> 20:22 24:22 25:2 38:2,6 42:3 52:19 57:7,8 60:9 80:21 99:12		<b>home</b> 112:7		
			<b>homes</b> 121:11		
			<b>homicide</b> 38:8 39:8 40:5 94:1 108:21 109:7 111:5		
	<b>Heidi</b> 4:19	<b>hey</b> 20:15 36:7,18 64:11 78:19 79:9			
	<b>hell</b> 76:14				
	<b>helmet</b>				
					<b>I</b>
					<b>IAP</b> 108:21
					<b>idea</b> 122:19
					<b>identifie d</b> 6:13 60:12
					<b>identify</b> 87:15
					<b>if</b> 6:12 8:8 12:24 16:1 18:5 19:4,21,

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

23 22:19	40:21	12,13,14	94:1,6,8,	117:2	<b>individua</b>
25:1,5	41:8	39:8,12,	21 95:7	119:1	<b>ls</b>
29:3,5,11	<b>immediate</b>	14 40:21	97:6	<b>incidents</b>	29:6
32:24	101:6,7	41:8	101:21	39:13	39:7,14,
34:1	<b>immediate</b>	42:16	102:4,12	115:25	23 41:7,
36:11	<b>ly</b>	43:20	103:5	116:4	25 47:5
39:2	76:5	45:11,21	104:5	<b>include</b>	52:18
41:14	99:15	46:6	105:5	92:16	54:9 59:5
42:24,25	<b>impact</b>	48:15	109:3	<b>including</b>	60:8,12
43:1 45:1	71:20	49:13,15,	110:25	98:23	83:1
53:16,24	<b>implying</b>	17,21	111:2,3	<b>indicate</b>	92:19
57:15,19,	119:22	50:7,10	112:5,16,	88:8	93:16
22 58:1,	<b>important</b>	51:23	23 114:5,	93:12	105:5
4,5,25	21:23,25	52:19	7,10,20,	<b>indicated</b>	<b>informati</b>
59:1	22:4,7,12	53:1,5,6	22 115:5,	38:5 93:3	<b>on</b>
60:23	47:14	54:6,9,23	25 116:8,	<b>indicates</b>	7:20
61:2	<b>improve</b>	57:5,12,	10,14	81:1	37:6,23
62:19,20,	72:2	18 58:1,	117:24	<b>indicatio</b>	45:11,12,
22 66:9	<b>in</b>	3,10	119:11	<b>n</b>	18 47:14
67:22	4:13,16	59:3,6,23	120:1,5,	38:22	52:16
68:24	5:4,15,21	60:3,13,	6,21	78:11	83:23
70:25	9:20	22,24	121:2,10,	79:10	85:6 88:7
71:9,10	11:6,9,11	61:19	14 122:5,	87:8	95:3
74:4,18	12:18	63:2,12	7	<b>in-depth</b>	109:4
77:10,17	13:5	64:17,22	<b>incidence</b>	108:13	<b>informed</b>
81:7	14:21,23,	65:2,18,	30:18	<b>indiscern</b>	41:3
83:12	24,25	22,23,25	<b>incident</b>	<b>ible</b>	<b>inhibit</b>
84:9,13,	15:3	68:15	30:18	108:11	7:3
17 86:25	16:15,21	70:5	<b>individual</b>	<b>1</b>	<b>insert</b>
87:3	18:14	71:13	31:17	20:20	56:21
88:19	20:20	73:19,20,	39:20,21	21:23	57:12
89:12	22:13	23 74:2	40:8	24:21,23	58:22
91:25	23:10,14,	75:16,17,	41:2,4	25:1	60:20
92:17	20 24:2	18 76:9,	50:12	29:25	<b>inserted</b>
94:6	25:5,20	10,11	54:13	61:3 89:6	56:20
96:12	26:4	78:1,18	68:15	120:3	61:12
98:16	27:5,8,21	80:5,8,19	69:11	122:7,9,	<b>inside</b>
99:2	28:6,15,	81:12,16	70:10	11	20:23
101:24	21 29:25	82:3,12	71:15	<b>individua</b>	24:23
102:22	31:4,18	83:11	73:20,23	<b>l's</b>	29:3,6,
107:5	32:10	84:25	83:12	120:16	19,24
109:25	34:4,25	85:3	84:3	<b>individua</b>	37:24
112:20,23	35:4	86:3,4,13	85:25	<b>lly</b>	38:6,20
117:13,25	36:2,3,8	87:23	95:19	72:3	39:24
121:8,15,	37:25	89:10	109:13,15		40:10,20
16,22,23	38:2,11,	90:10,16	113:16		42:1,4
122:4		91:15	116:7,20		47:10
<b>illegal</b>		92:17			
38:14		93:1,5,			
		15,23			

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

57:22	<b>interroga</b>	<b>investiga</b>	18,21,23	10,21	24 115:16
60:8 83:2	<b>tories</b>	<b>tive</b>	24:3,14	69:1,17	118:17,24
86:7,12	114:24	14:14	25:3,7,8,	70:7,22	119:10
92:19	<b>interrupt</b>	93:19	9,11	71:5,9,	120:9
98:25	33:19,23	105:12,	26:2,7,8	10,11,19,	121:9,12
99:4	<b>intervene</b>	17,25	28:13	22 72:23	122:1,3,
102:6	22:22	106:10	29:24	73:4,20	13
<b>instance</b>	<b>into</b>	<b>involved</b>	30:6,7,8,	74:2,15,	<b>it's</b>
45:24	20:25	35:2	9,18,25	18 76:1	5:24 7:9
<b>instead</b>	25:21	37:25	31:13	77:12,23	13:20
63:4	29:20	38:13,14	32:1,3,8,	78:2,24	14:12,20
<b>insuffici</b>	31:14,22	39:8,12,	12,20,24	80:2,3,10	18:12
<b>ent</b>	32:22	14 40:21	34:17	81:11	20:2,17
96:24	33:4	41:7	35:22,24	82:4	23:2,6
97:9	42:20	60:13	36:8,19,	83:12,16,	24:8,24
<b>intel</b>	43:4	68:15	20 37:3,	19,21,24	25:1,8,
27:17	46:25	70:5 72:8	5,16	84:17,19,	14,24
<b>intellige</b>	47:17	110:16	38:4,9,	20,25	26:13
<b>nce</b>	48:21	<b>Isaiah</b>	11,18,23,	85:3,4,13	27:16,19
13:14,16	56:20,22	6:17	25 39:3,	86:1,5,8,	28:21
27:20	58:6,7	110:7	5,10,14	12,18	32:15
29:8	59:7	<b>issue</b>	40:15	87:2,7	34:23
38:3,4	60:25	14:5	41:12,24	89:15,24,	37:1
45:20	70:20	25:24	42:10	25 90:9,	44:23
54:11	72:6 80:3	72:25	43:14	16,24	46:3 47:7
57:8,22	89:21	73:5	44:12,25	91:3,6,7,	50:15
60:8	110:5	114:4	45:9	10 92:2,	56:7,16,
116:12	119:2,12	120:22	46:9,16,	13 94:6,	17 58:17,
<b>intending</b>	120:11	<b>issues</b>	23 47:17,	9,19 95:6	19 59:17,
87:3	<b>intoxicat</b>	14:6,15	19 48:14,	96:1,8	21,22
<b>intense</b>	<b>ed</b>	50:3,4,6,	21 49:6	97:25	61:2
114:3	116:8	10,16	51:6,13	98:6,10	63:4,5
<b>intent</b>	<b>investiga</b>	52:10,11	52:10,11	99:8,12,	64:5
18:21	<b>te</b>	53:2 54:7	53:2 54:7	18 100:4,	65:15
21:18	14:17	56:16	56:16	5,9,18,21	66:21
<b>intention</b>	<b>investiga</b>	57:1	57:1	101:10,	68:17,19,
11:16,17	<b>ting</b>	58:11,12,	58:11,12,	11,17	25 71:1,
77:9	105:6	19,20,21,	19,20,21,	102:4,17,	23 72:8
<b>interfere</b>	<b>tion</b>	22,23	22,23	25 103:7,	73:11
90:23	<b>investiga</b>	59:3,13,	59:3,13,	8,11,24	78:23
<b>interior</b>	<b>tion</b>	16,22	16,22	106:1,4,	80:20
30:11	<b>tions</b>	17:20	60:15	7,25	85:21
	14:14	18:19,21	61:6,13	107:6,24	89:16,17,
		19:1,5,24	63:3,16	109:19	18 90:3,
		20:5,15,	64:1	110:7	12,14
		23 21:7,	66:19,23	111:19	91:8,10,
		16 23:1,	67:3,8,22	112:2,14	25 92:1,
		7,11,17,	68:3,9,	113:3,11,	5,7 95:15
				21,25	96:22
				114:1,4,	



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

97:20	<b>James</b>	71:12	45:13	<b>knock</b>	70:18
98:1,2,21	77:3	72:14	48:21	16:2	71:23,24
100:6	<b>January</b>	77:23	112:7	17:6,7	72:2,15,
101:10	19:11	79:6 80:9	<b>kill</b>	18:6	17 73:11,
104:1,24	20:9	83:21	72:21	21:11,12	13 74:3,
108:9,10	<b>job</b>	85:13	78:5	24:5 27:6	11 75:11,
113:25	16:13	90:12	87:11	29:21	15 77:17,
114:2,3	22:13	91:19	88:2	74:18	24 79:3
118:15,21	69:7	94:15	<b>kind</b>	77:14	83:9,11,
119:8	70:25	96:11	16:3,24	85:7	12 84:6,
<b>items</b>	71:3,5	106:4	17:12	<b>knock-</b>	7,14
37:21	107:20	112:25	21:7,8	<b>and-</b>	86:1,3,5,
45:23	108:5	114:4,20	31:13	<b>announce</b>	8,9,22
50:24	<b>jobs</b>	115:3,19,	32:2,9	26:23,25	87:1,3,20
111:2	101:2	20	34:21	27:3,24	88:20
112:13	<b>join</b>	117:13,15	35:22	83:6,7	90:3,11
<b>its</b>	114:16	<b>K</b>	36:7,18	<b>knocked</b>	91:3,4
74:19	<b>judge</b>	<b>keep</b>	37:7	44:5	94:13,18,
<b>itself</b>	23:25	32:5	47:17,25	<b>know</b>	21 95:14,
16:15	<b>judicial</b>	60:25	50:17,20,	7:16,17,	22 96:2,
24:2,10,	106:24	72:16	21 56:1	18,21	6,8 97:6
24 28:20	<b>jump</b>	94:19	58:16	10:21	99:2
31:17	31:14	<b>kept</b>	61:23	12:7	102:7
37:19	<b>just</b>	73:8	62:22	14:16	104:18,
38:9,13	8:8 12:1	<b>key</b>	63:9 64:5	16:14	23,24,25
40:20	18:15	45:22	68:24,25	18:16,22	105:1,9,
45:22	29:9	<b>kick</b>	69:1	19:18	11
48:23	30:17	46:10	71:13	20:1,18	106:14,
52:17	31:20	119:11	72:23	29:25	16,17,18
56:14,20	32:2	120:10	80:2	31:15	108:14,18
57:3,15	34:16	121:4,9,	96:12	32:19	109:8,10
58:3,23	36:15	15,25	113:13	34:14	110:12,
60:9	40:23,25	<b>kicked</b>	116:3	42:18,21,	14,21,22
61:1,4,11	44:20	119:1	<b>kinds</b>	24 43:10,	111:7
63:7,8	45:4,5	<b>kid</b>	82:5	19,21	113:3
64:14	47:7	59:1	<b>knew</b>	44:8,9,18	114:3,14
65:7	49:20	111:25	15:17	45:1,23	116:22
89:11,12	50:4 53:5	112:4,18,	33:4	47:14	118:20
101:4	55:16,17,	22	39:13	48:2	120:8,15,
<b>J</b>	22 56:16,	<b>kid's</b>	42:6	50:1,9	16,22
<b>Jake</b>	17 59:22,	93:9	53:21	52:24	121:10,
33:6,10,	23 60:5	<b>kids</b>	57:14	57:6,19,	12,13,15,
11 51:1	63:5,9	42:25	102:20	20 59:19,	22,23
65:11	66:9,10	43:12	103:24	24 60:25	122:2
	68:4,19		104:3	61:15	<b>knowing</b>
	70:12		108:4,17	63:25	40:20
			110:23	68:19,21	52:19
				69:3,17	74:11
					80:18,19,



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

21,23 96:2,9 97:17 99:10 101:24 102:5,11 105:4	<b>last</b> 8:24 71:11 <b>later</b> 9:2 <b>Latia</b> 4:14 5:16,21 <b>law</b> 80:25 81:9 83:5 98:10 <b>lead</b> 13:2 <b>leader</b> 34:5,6,7, 12,18,23 103:15 <b>leading</b> 51:8 <b>learn</b> 72:6 95:19 109:12 <b>learned</b> 109:14 117:6 <b>least</b> 116:5 <b>leave</b> 69:21,24, 25 113:12 <b>led</b> 44:20 <b>legal</b> 4:18 74:17 <b>length</b> 69:16 <b>lengthy</b> 8:19 <b>Leo</b> 6:4	<b>less</b> 20:15 <b>lesser</b> 81:15 <b>let</b> 5:14 19:24 20:5 30:3 40:13 51:13 72:14 86:8 87:6,19 98:1,10 99:1 109:16 114:23 <b>let alone</b> 96:25 <b>let's</b> 51:18 61:20 94:19 <b>lets</b> 59:16 <b>letting</b> 57:19 68:21 <b>level</b> 11:18 15:21 17:15,21 23:16 <b>Levi</b> 65:8 <b>Lexitas</b> 4:20 <b>lieutenant</b> 51:17,24, 25 52:2, 3,7,9 53:8 54:20 55:6	56:11,23 60:1,3 107:10, 13,19 108:2,13, 20 113:17,24 118:11 <b>life</b> 68:14 72:8 111:23 <b>life-</b> <b>threateni</b> <b>ng</b> 21:5 <b>light</b> 89:11 <b>like</b> 7:21 11:25 12:6 13:6 14:16,20 16:2,5, 13,22 17:1 20:13,14, 15 21:2,8 24:1 30:2 32:18 34:25 35:23 36:16 37:1,7 42:17,19 43:1,7 45:24 47:21 50:17 57:23 58:8,15, 17 60:5 61:1 62:13,19, 23 64:7, 16 68:16 69:1,11, 13,18,21,	22 70:3, 19 71:13, 16,17,18, 19,25 73:22 76:12,13 77:23 79:20,21 81:16 82:19 84:10 87:24,25 89:22 93:10,12 95:23 96:12 98:3,17, 18 100:5, 18 101:24 104:15 106:13 119:21,22 120:13 <b>likely</b> 20:8 38:20 <b>line</b> 63:2 65:3,5,9, 18 74:2 <b>lined</b> 66:1 <b>lineup</b> 65:23 <b>list</b> 9:3 68:2 <b>listed</b> 37:18,20 54:13 82:23 <b>listen</b> 28:6 77:6 <b>little</b> 19:25 20:5 21:7 23:19	28:8 31:14 41:1 51:18 55:8 59:12 63:10,11 71:9 73:4 76:3 79:16 80:2,3,10 83:20 87:7,20, 21 91:5, 14 99:20 115:4 119:5 <b>live</b> 120:9 <b>lived</b> 11:8 94:2 <b>living</b> 11:6 57:14,15 <b>load</b> 64:23 <b>loaded</b> 62:3 <b>loading</b> 64:21 <b>located</b> 4:12 25:5 30:9 37:1 40:10 <b>location</b> 64:14 <b>long</b> 7:16,21 11:8,12 15:1 44:18 50:11 69:15,24 92:2 118:16,21
<b>knowledge</b> 20:13 48:9 58:15 81:19 84:10 87:15 93:23 111:8,10, 13 118:5, 8 <b>known</b> 43:8 46:5,9, 18,19 101:24 <b>Konsten</b> 4:20 <b>Kubla</b> 65:10 76:4 <b>Kubla's</b> 76:20					
<b>L</b>					
<b>L-E-O</b> 6:4 <b>labor-</b> <b>intensive</b> 114:1 <b>Larry</b> 116:19 <b>Las</b> 4:1,13,14 5:17 11:9 121:10					

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

121:6	<b>LRAD</b>	117:7	88:20	60:15	65:15
<b>look</b>	28:25	<b>main</b>	<b>March</b>	61:23	68:19
20:1 30:5	<b>lucky</b>	102:17	113:21	62:15	70:10
36:16,23,	68:19	<b>major</b>	114:4	64:6,25	73:17,25
24 37:6,	<b>LVMPD</b>	13:18,20,	<b>mark</b>	65:4	76:7,10
20 44:11	30:22	25 120:1	6:12	66:9,10,	78:25
46:22,23	31:9	<b>make</b>	<b>marked</b>	19,24	79:2,4
65:14	64:16	24:8	66:21	68:1,24	85:23
70:18,19	92:23	26:2,17	<b>marksman</b>	69:1,6	87:24
72:2	94:11	34:16	76:14	70:18	89:8 91:3
89:12,13	95:8 97:3	35:24	<b>matter</b>	71:22	95:10,13,
100:5	106:23	63:20	5:16	74:21	24 96:1,5
115:14	107:1,16	72:12	<b>maybe</b>	76:2	110:5,15,
<b>looked</b>	108:23	98:19	20:2	83:20	16
41:21,24,	<b>LVMPD802</b>	100:2,3,	44:17	84:8,9	114:13,14
25 42:5	89:2	19 103:8,	71:8,11	87:5,7,	<b>meaning</b>
100:18	<b>lying</b>	17	84:19	11,19	73:20
<b>looking</b>	75:15	<b>making</b>	106:4	88:1,7	<b>means</b>
37:12,17	<hr/>	28:23	<b>me</b>	90:9	17:6
45:16	<b>M</b>	86:5	6:11 7:12	91:24	18:19
57:3,4	<hr/>	103:23	11:4,15	93:3	24:6
60:10	<b>M4</b>	<b>males</b>	12:17,21	98:1,5,13	52:25
69:5	62:16	47:9	15:2	102:24	<b>mechanics</b>
74:15	63:4	<b>man</b>	17:6,11,	103:10	47:17
94:21	<b>ma'am</b>	77:17	12,21	104:15,17	72:23
96:1	8:13	86:22	18:5,25	106:4	<b>medicatio</b>
101:17	12:16	112:4	19:14,24	109:16	<b>ns</b>
120:25	19:12	<b>managemen</b>	20:5 21:6	113:13,	7:3
<b>looks</b>	55:21	<b>t</b>	22:14	20,24	<b>meet</b>
37:7	81:25	107:14	25:15	114:23	7:25
58:17	91:23	<b>manpower</b>	28:8 30:3	116:4	<b>meeting</b>
<b>loop</b>	92:5	48:3	32:3,9	119:20	8:4
40:13	104:10	51:15	34:21	<b>mean</b>	<b>Melanie</b>
<b>lost</b>	<b>Madam</b>	<b>manpower-</b>	39:2	15:11	52:3
99:15	6:11	<b>intensive</b>	40:13	16:14	<b>member</b>
101:5	<b>made</b>	114:2	43:12	17:16	12:2
<b>lot</b>	26:5,6,11	<b>manual</b>	44:23	18:7,24	22:21
8:21	45:7,9	92:11	45:4,5,9	19:10	<b>members</b>
68:22	75:2	99:17	47:6,8,25	22:8	22:17
88:21	77:14	<b>manufactu</b>	48:10,12	26:20	39:16,17
89:10	78:3	<b>rer</b>	50:3,5	32:19	40:3
103:12,	88:15,17,	89:15,16	51:13,19	34:5,11,	43:16
19,20	21,22,24	<b>many</b>	52:6 55:2	22 45:17	48:20
114:1	108:3,15,	7:22	56:2	46:11	54:16
<b>loudly</b>	16 109:2,		58:13,16	47:5	57:11
86:6	3 112:9		59:11,13	59:19	
				60:18,21	
				62:18	
				64:5	

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

80:19	<b>mistake</b>	<b>morning</b>	109:12,14	105:6	96:4,10,
88:3	117:7	4:23	110:13,	<b>Murphy</b>	16 97:14
97:17	<b>mitigatin</b>	<b>most</b>	20,21	4:23,24	100:11,17
105:9	<b>g</b>	6:24	111:21	5:13,19	104:16
121:1	30:12	21:22	123:7,15	6:10,14	112:4,5
<b>memory</b>	<b>mixed</b>	22:4,6,12	<b>MS</b>	9:12	116:14,22
48:11	28:7	46:21	4:23 5:13	26:21	117:15
52:5 60:2	<b>modified</b>	71:3	6:10,14	32:7	118:22
65:5 85:5	71:18	78:23,24	9:12	34:10	121:22
93:3	<b>modify</b>	89:13	26:21	55:8,15	123:4
<b>mental</b>	71:24	91:21	32:7	66:9,18	<b>myself</b>
70:3	123:1	<b>mother</b>	34:10	67:5,8,	65:12
<b>mentioned</b>	<b>moment</b>	52:23	55:8,15	11,24	
38:11	123:8	60:11	66:9,18	70:14	<b>N</b>
<b>messages</b>	<b>money</b>	110:14,	67:5,8,	71:7	
118:10	116:17	16,20	11,24	77:1,19	<b>name</b>
<b>met</b>	<b>monitor</b>	111:24	70:14	86:23	4:18
7:14,22,	4:10	<b>move</b>	71:7	112:12	5:19,23
23	38:16	58:8	77:1,19	117:11,22	6:1,3
<b>Metropoli</b>	40:8	122:4	86:23	123:6	116:22
<b>tan</b>	48:18	<b>movement</b>	112:12	<b>muzzle</b>	<b>names</b>
4:15 5:17	<b>month</b>	28:22	117:11,22	69:6 76:7	28:7
<b>middle</b>	69:18	29:19	123:6	<b>my</b>	48:16
6:1,3	84:13	<b>moving</b>	<b>much</b>	4:18 5:19	<b>narcotic</b>
<b>million-</b>	<b>months</b>	11:16	43:19	6:23 8:7	15:19
<b>dollar</b>	14:1	35:7	44:8,9,18	13:24	38:10
95:9	69:19	<b>MP5</b>	70:21	16:1 20:1	53:3,17
<b>mindset</b>	70:1	39:18	<b>multiple</b>	26:15	<b>narcotics</b>
120:16	84:18	52:21	99:18	27:8,14	13:12
<b>mine</b>	94:4	<b>Mr</b>	<b>murder</b>	37:15	14:19,25
66:17	<b>more</b>	5:1,19	37:16	39:2	15:1,4,
<b>minimum</b>	9:1 34:16	7:15,18,	53:10	40:13	12,23
20:14	40:16	22,23	57:6,9	44:7,16	40:4,5
<b>minute</b>	71:19,21	8:1,5	60:10,14	49:13	43:14
66:11	76:3 79:7	26:18	87:3	52:24	52:23,25
76:4	80:3	67:21	99:11	53:21	80:20
<b>minutes</b>	83:20	70:12	102:7	67:4 69:7	81:23
7:24 29:2	93:18	74:22	105:7	70:21,24	97:13,16
45:2	102:25	75:5	106:17	71:3,5,6	<b>National</b>
117:15	108:12	76:24	110:8,11	72:4 77:6	84:2
<b>misrepres</b>	112:18	77:13,15	111:13	79:5,18	<b>necessari</b>
<b>ent</b>	115:4	79:9	120:25	83:9	<b>ly</b>
98:13	119:5,20	86:16,20	121:1	85:23	60:21
	121:2,5	88:8	<b>murderer</b>	87:21	<b>necessary</b>
		90:17	80:7,14	88:1,4,6	56:4 57:1
		104:21	82:15	91:5	
			99:11	94:24	
				95:17	

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>need</b> 32:4 34:8 42:18,24 67:19,21 72:16 74:3 113:3 115:14 123:14	19 59:14, 15,16,22, 23 <b>no</b> 6:21 7:1, 6 8:3 9:21,24 10:2,7,11 11:16,17 12:8,10 16:7,9 17:1,2,4 18:22 20:3,17 24:7,13, 15,17 26:15,20 27:4,12 29:11 33:23 35:17,19 39:11 40:17 41:24 56:16 59:10 63:15,17 67:18,23 70:6 71:6 76:22 79:15 82:15,19, 20 85:9 87:8 93:4,5,23 97:19 100:16 103:21 111:8,11 115:21,24 117:1 118:7,8 122:20 123:2,7 <b>no-knock</b> 22:24,25 23:6,10, 11,14,23 24:4,6,8,	11,18,20, 25 104:9, 13 105:14 106:8,22 107:3 112:15 <b>nodding</b> 14:7 <b>none</b> 69:5 111:2 <b>nonforcef</b> <b>ully</b> 99:2 <b>normal</b> 10:15 56:17 <b>not</b> 6:23 7:18 9:24 17:4 22:15 24:13 25:6 28:21 29:3 30:13,23 31:9 33:19 34:1,2 40:10,22 43:6 46:4,13 51:25 52:1 59:2 60:20 63:15,16 68:25 71:9 72:3 77:18 82:20 86:11,17 90:17,19 92:14,22 93:6,16, 20 94:8, 11 96:2 98:13	100:1 101:5 102:13 105:13 107:11, 16,18,19 108:22 110:8,11 111:9 112:18 113:4,14 120:4 121:14 <b>notes</b> 117:16 <b>nothing</b> 110:23 116:20 <b>notice</b> 6:6 21:17 74:19 <b>noticed</b> 46:16 <b>notificat</b> <b>ion</b> 32:11 <b>notified</b> 18:20 40:24 <b>notify</b> 21:13,14 51:24 <b>notifying</b> 86:2 <b>now</b> 4:8 11:1 13:20 14:3 30:25 31:12,14 46:6 47:16 65:13 72:9 74:11,15	77:5 94:5 96:1 97:17 101:18 102:11 111:11 115:19 122:23 <b>NRS</b> 18:12,13, 15,19 <b>NTOA</b> 83:25 84:1 <b>number</b> 4:16,24 5:18 18:16 29:5 65:10,11, 12,13,14, 21 79:21 115:6 116:1 <b>numerous</b> 43:15 92:16 112:3 <b>NV</b> 119:11 <hr/> <b>O</b> <hr/> <b>O'DANIEL</b> 52:4,8,9 53:8 54:20 55:6 56:11 107:10,20 108:2,13 113:18,24 118:11 <b>O'Daniel'</b> <b>s</b> 107:13	108:20 <b>oath</b> 55:17,19 <b>Objection</b> 26:18 77:15 86:20 111:21 <b>objective</b> <b>ly</b> 97:20 <b>obtain</b> 11:25 <b>obtained</b> 106:8 <b>obviously</b> 13:5 17:17 23:24 25:18 42:13 45:17 48:13 59:2 64:6 72:19 73:8 79:4 85:23 94:12 101:8 108:6 111:16 114:15 117:1 <b>occasions</b> 44:14 <b>occupant</b> 97:10 <b>occupants</b> 21:13 86:7 96:24 <b>occupied</b> 47:15 <b>occurred</b>
--	--	--	---	--	--

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

12:19	18,24	80:3,4,5,	114:1,17,	76:4,22	15,17,18,
<b>October</b>	37:1,7,16	12,15,16,	20 115:7,	87:17	19 29:2,
4:2,10	39:13,15	23 81:1,	12,16,22	<b>officer's</b>	7,14
123:11	40:7,19,	10,11,13,	116:3,5,	21:18	30:1,12
<b>of</b>	24 41:6	15 82:5,	8,14,18	<b>officer-</b>	32:11,15
4:4,9,17,	42:15,16,	13,21,22,	117:3,8,	<b>involved</b>	33:2
25 5:15,	17 43:3,8	23,25	23,25	6:16	35:11
16 6:6,17	44:4	83:2,18	118:5,8,	12:19	37:18,20
8:21,22	45:21	84:6,9,24	10,25	70:5	38:8
9:3,25	46:1,2,6,	85:3,4,5,	119:10,18	<b>officers</b>	41:2,4,6
10:5,10,	13 47:11,	11,15	120:7,20,	12:7	43:19,24
15 11:16,	12,17,25	86:4	25 122:24	22:20	44:5,20
18 12:2	48:9,11,	88:9,16,	123:3,10,	25:3	45:11,25
13:22	25 49:16,	21 89:4,	14	28:17	46:7,10
14:13,23	17 50:7,	10,15,23	<b>off</b>	33:13	47:2
15:9,19,	17,20,21	90:2	10:18	71:17	48:18,23
23 16:3,	51:3,6,9,	91:14,20,	13:6	78:13	49:8,10,
15,20,24	11,20	21 92:13,	32:1,13	79:11	12 50:11
17:12,18	52:5,14,	14,16	33:9 51:2	81:6 84:2	51:3 52:9
18:10,24	18 53:9,	93:1,2,7,	55:10	86:18	54:13
19:6,7,	14,15	15,24	56:9 58:4	87:4 88:9	55:3,7,
10,17	54:18,19	94:13,19,	59:16,23	99:14	13,18,24
20:8,12,	56:1	22,23	65:23	102:4	56:5,6,9
14,15,17,	57:9,22,	95:8,20	66:2,10,	116:18	58:20
19,24	25 58:9,	96:10,12,	12 72:14	<b>officers'</b>	60:21
21:7,8,	15,16	16,19	78:3	10:6	61:3,6
10,11,12,	60:1,3,8,	97:16,19	84:16,17	<b>official</b>	62:3,7,
14,16,18	11,12	98:22,23	88:16	83:10	11,15,25
22:11,16,	61:23	99:14,15	90:20	<b>omitted</b>	63:1,2,8,
17,21	62:22	100:17	108:4	107:13	13,15,16
23:1,2,	63:1,3,4,	101:5,9,	113:12	<b>on</b>	64:4,7,
13,22	9,12,18,	13,14,18	117:15,17	4:8,10,24	10,13,21,
24:10	22 64:5,	102:4,14,	122:15	12:15	23 65:16
25:15,17,	16 65:6,	16,18,20	123:11	13:7	66:15,24
19,25	15,16,23,	103:12,	<b>off-duty</b>	15:2,3,22	67:6
27:20,23	25 68:2,	18,19,20	116:7,10	17:21	69:21,24,
28:7,12,	4,15,20,	104:6,11,	<b>offenders</b>	19:18	25 70:10,
15,16,17,	22,23,24,	19 105:5,	13:20	20:2,9,18	22 71:5,
18,20	25 69:1,	8,22	<b>office</b>	23:8,22,	10,20
29:13	4,5,16	106:3,6,	8:1	23 24:3,	72:2
30:23,24	71:13,16	13,14,15	<b>officer</b>	11,14	73:10
31:10,13,	72:5,6,7,	107:12,	9:6,10,19	25:1	74:5,6,8
17,24,25	22,23	14,15	10:4 13:6	26:22	75:15
32:2,9	73:19,20,	108:4,13,	16:14	27:2,15,	76:3
33:2	21 74:19	17,21,22	22:14,22	18,19	79:19
34:4,21,	75:7,18	110:8,11,	65:8,10	28:8,13,	80:11,23
25 35:8,	76:11,14	22 111:2,	74:19		81:2,13,
22 36:3,	78:1,15	10,13,18			22 82:16
7,11,14,	79:11,17,	113:13,			83:21
	21,25	15,16			84:4,20

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

88:11	59:8	75:6,8	70:25	39:13	60:22
89:2 90:8	60:11	78:12	71:5,10	71:17	61:10,17
91:17	65:10	89:3	88:1,4	73:21	68:23
93:6,8,	66:21,25	96:22	91:17	76:16,19	69:7
11,19,20	67:22	99:14	94:9,16,	79:9,11	74:4,8
95:17,20	72:22	100:6	22 99:23	86:13	76:11
98:22	73:9	101:11	103:18	96:6,7	80:10,25
100:4,9,	76:13	103:25	107:24,25	97:6,7	84:6
22 101:1,	78:17	106:21	108:24	103:21	86:2,4
9,12,17,	79:7 80:4	<b>opened</b>	<b>opinion-</b>	104:5,15	93:4,7,9,
25 102:8,	81:9,11	73:15	<b>based</b>	110:10	16,20
10	88:17	<b>opening</b>	98:3 99:6	112:4,13	94:15
103:13,19	98:1,5	114:8	<b>opinionat</b>	113:1	95:21
104:1,3,	100:4	<b>operated</b>	<b>ed</b>	120:21	112:3
14 105:1,	101:11,	96:17	108:6	122:22	<b>outcome</b>
9,10,12,	14,18	<b>operating</b>	<b>opinions</b>	<b>otherwise</b>	72:7
13,16	102:14,	49:14	104:18,19	81:17	<b>outer</b>
106:3,6,	17,18,25	58:23	<b>opportuni</b>	<b>ought</b>	28:12
10,11,14,	109:10	61:6	<b>ty</b>	46:17,19	<b>outlined</b>
16,17,21	110:11	118:2	104:16	74:12	115:5
107:19,	115:10,25	<b>operation</b>	<b>option</b>	103:1,3	<b>outside</b>
21,24	116:1,9,	49:16,18	102:1	105:18,20	79:11
108:7,8,	16,18	50:7	106:1	<b>our</b>	<b>outstandi</b>
24 109:10	117:3,8,	56:10	<b>order</b>	28:14	<b>ng</b>
113:10	9,23	62:25	23:14,20	29:9,10	53:11
115:16	118:25	63:3 74:6	25:20	47:15	105:7
116:25	121:3	<b>operation</b>	51:23	48:3,4	<b>over</b>
117:1,20,	123:8	<b>al</b>	57:12	62:6	21:7
24 118:2	<b>one-bath</b>	35:4	59:3,6	64:22	35:22
119:23	97:13	<b>operation</b>	60:3,22	65:7,9	37:21
121:7,12	<b>one-</b>	<b>ally</b>	116:14	75:2 86:2	44:4
123:10	<b>bedroom</b>	35:5	122:5	120:8	50:1,2
<b>once</b>	97:12	<b>operation</b>	<b>organizat</b>	<b>out</b>	83:17,19,
28:19	<b>ones</b>	<b>s</b>	<b>ions</b>	10:23	21,24
46:14	60:13	64:21	12:3	13:22	87:21
121:5	<b>ongoing</b>	119:23	<b>organized</b>	32:3	114:23
<b>one</b>	70:3	<b>operator</b>	116:11	33:13	117:7,8
8:9 10:21	<b>only</b>	61:3	<b>other</b>	35:21	<b>overload</b>
16:22	36:3	63:7,8	8:4,14	36:11,15,	89:5
18:12	42:11	<b>operators</b>	10:3,5	22,23	<b>overpress</b>
19:2 22:3	77:6	92:12	13:6	42:19,21,	<b>ure</b>
34:9,16	86:12	<b>opinion</b>	14:24	24 43:2,	89:11
36:17	104:16	27:5,8,	16:14,20	22,23	<b>overwhelm</b>
38:16	106:22	13,14	22:19	44:2,3,	25:21
39:15	107:2	<b>open</b>	27:15	13,14	99:16
40:7 41:6	47:1			45:1,5	
42:3				57:13,16,	
50:16,18,				18 58:21	
19,20,22					

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>overwhelm ing</b> 101:9	28:12 33:1 39:1 53:15 54:15,18, 19 71:11 73:24 80:12 82:13 84:24 85:3 89:14 92:7 95:20 96:10 99:13 101:13 102:16 106:17,18 115:16	<b>pejorativ ely</b> 87:24	18 <b>personnel</b> 48:3	<b>planned</b> 42:14	91:2,8
<b>owner</b> 116:24		<b>people</b> 25:21 29:20 32:3 38:10 50:23 57:4 78:24,25 86:12 89:13 95:13 97:14 101:1 102:3 103:21 118:24 120:9,15, 21	<b>phone</b> 29:5 32:12 37:19 51:3 52:10 82:18	<b>planning</b> 35:3 48:25	<b>policies</b> 30:22 31:9
<b>P</b>				<b>plans</b> 35:6	<b>policy</b> 52:1 64:16 92:23 94:10,22, 25 95:8 96:17 107:1,17 108:23 117:1 118:1
<b>p.m.</b> 4:3,11 55:11,14 66:13,16 117:18,21 123:12,17			<b>phonetic</b> 116:19	<b>plate</b> 46:10	
<b>PA</b> 28:24			<b>physical</b> 45:22,23	<b>played</b> 67:2,10	
<b>page</b> 81:9,10 89:2 92:7 96:22 106:21 107:9 115:17, 20,21 119:8	<b>partial</b> 11:24	<b>peoples</b> 103:18	<b>picture</b> 110:22	<b>please</b> 4:21 5:4, 22 6:12 7:7,12 12:21 17:5 32:5 34:16 42:21 119:6 123:15	<b>policy/ training</b> 92:22
<b>pages</b> 8:10,24	<b>participa te</b> 84:25	<b>per</b> 43:11 52:1 99:17	<b>pie</b> 96:14,17		<b>poor</b> 120:20
<b>paper</b> 80:11	<b>participa ted</b> 85:3	<b>performin g</b> 22:13	<b>piece</b> 120:19		<b>poorly</b> 16:2
<b>parameter</b> 20:15	<b>particula r</b> 73:24	<b>period</b> 13:17,23 36:12	<b>pinned</b> 40:7		<b>Portion</b> 107:13
<b>parameter s</b> 17:21,25 19:14 20:25 25:18	<b>partners</b> 112:5	<b>periphera lly</b> 32:9	<b>place</b> 5:15 28:14,21 43:16 76:13	<b>point</b> 36:2 53:13,15 57:16 64:17,19 65:25 86:11 87:23 100:3,17	<b>ports</b> 59:16,22
<b>part</b> 10:15 14:23 15:9,19 19:17,23 21:16 25:25 27:24	<b>parts</b> 33:10	<b>person</b> 27:21 90:5 99:9	<b>places</b> 86:13	<b>pointed</b> 69:6 76:6 94:15	<b>position</b> 12:12,18 14:21 34:22 37:8 72:4 75:16,18 98:21 100:21 107:21,23 108:24 114:11
	<b>patio</b> 93:11	<b>person's</b> 21:17 104:1	<b>plainclot hes</b> 14:12,20	<b>police</b> 4:15 5:17 13:7 21:18 22:14 86:6,18 87:3,16 88:9 90:24	<b>positione d</b> 78:1
	<b>patrol</b> 13:6,17, 23,24 14:4 116:13 117:2	<b>personall y</b> 70:13,14,	<b>plaintiff</b> 4:25 5:20		<b>positioni ng</b> 30:6
	<b>pedal</b> 72:14				



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>positions</b> 12:22,23 13:4 25:4 28:15 109:4	<b>preapproval</b> 106:24	<b>pretty</b> 8:18 78:4	53:25 54:2,8	<b>profession</b> 12:4	7:4 57:21,22 79:10 118:14
<b>possession</b> 116:8	<b>predicate</b> 109:16	<b>prevails</b> 19:2	<b>probable</b> 40:23 41:5,6 104:20	<b>professional</b> 12:3	<b>providing</b> 118:10
<b>possibility</b> 42:8 53:22,24 78:7,8 86:16 91:10 102:6 105:12	<b>predicated</b> 81:13	<b>previous</b> 80:23 119:23	<b>probably</b> 7:24 22:12 44:12,24 68:16 92:3 103:19 106:18 109:18	<b>proficient</b> 71:4	<b>psychological</b> 70:4 89:4
<b>possibly</b> 24:23 25:4	<b>preparation</b> 7:14 33:10 114:22	<b>previously</b> 80:22	<b>problem</b> 67:18	<b>progressives</b> 29:9	<b>psychologist</b> 69:12
<b>possible</b> 71:4	<b>prepare</b> 7:13 8:1, 5 9:4 68:5	<b>pride</b> 12:7	<b>problem-solving</b> 13:9,10 14:11	<b>promoted</b> 13:22	<b>public</b> 22:17,21
<b>potentially</b> 38:2 48:15 75:22 119:13	<b>prepared</b> 23:9 70:21 72:13	<b>prior</b> 9:6 12:22,23 14:21 24:6 25:21 37:25 39:12,19 40:3,14, 24 41:2 43:8,10 48:19 51:11 52:20 53:16 54:12 58:24 83:3 86:5 88:15 91:1 99:18	<b>procedure</b> 96:17 118:2	<b>propensity</b> 20:19 40:19 52:18 53:9 83:1 105:8 120:24	<b>pull</b> 66:11 73:25 74:7 98:1
<b>potential</b> 30:1 38:5 45:15 52:20 57:5 120:12	<b>presence</b> 18:20 21:14 86:2	<b>privilege</b> 7:19	<b>proceeded</b> 64:13	<b>proper</b> 83:6,7 107:11	<b>purpose</b> 21:11,12, 15 25:15, 17,19 57:25 58:9 74:19 85:10,11
<b>Powerpoint</b> 83:21,22	<b>present</b> 42:25 43:1 45:13,14 49:7 92:19 96:23 111:3	<b>priors</b> 57:10	<b>process</b> 23:1,19 28:24 51:20 76:3	<b>property</b> 14:18 41:20,23 42:11 92:12 116:24,25	<b>purposes</b> 43:5 49:20
<b>Powerpoints</b> 83:23	<b>presentation</b> 85:8,12	<b>privilege</b> 7:20	<b>product</b> 53:4 54:3	<b>property-only</b> 24:12 38:23,25 104:12	<b>pursuant</b> 43:11 105:24
<b>Prayed</b> 112:18	<b>press</b> 22:11	<b>probability</b>	<b>products</b> 54:4	<b>protect</b> 53:4 54:3,4,5 86:13	<b>put</b> 28:17 35:6 36:13,19, 20 48:4 69:21,24 84:20 88:18 90:7
	<b>prestigious</b> 114:14			<b>protects</b> 86:11	<b>putting</b> 35:5 37:4 102:4



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>Q</b>	119:7,16	<b>really</b>	116:17	<b>recorded</b>	<b>relative</b>
	<b>R</b>	17:10	<b>recalling</b>	8:11 9:14	65:19
<b>qualify</b>		19:16	47:7	88:25	<b>relayed</b>
111:18,19	<b>R-U-S-S-</b>	39:5	<b>received</b>	101:22	45:3,5
<b>quantify</b>	<b>E-L-L</b>	77:8,11	19:21	102:13	85:6
90:3	5:25	87:25	38:8	104:6	94:24
<b>question</b>	<b>radio</b>	90:7	52:16	117:24	95:2
15:7 16:2	64:11	98:19	83:4	<b>recovered</b>	108:3
17:11	<b>rake</b>	100:22	116:10	39:21	<b>relevant</b>
19:25	61:7,8,14	121:20	<b>recently</b>	80:22	47:13
24:2	<b>ram</b>	122:6	101:15	111:9,11	<b>reliable</b>
26:15	73:9	<b>rear</b>	<b>recess</b>	44:11	7:4,5
34:24	100:4	28:17	55:12	83:8	<b>relied</b>
35:18	<b>rammed</b>	<b>reason</b>	66:14	109:1	70:22
40:14	78:12	6:22 7:1	117:19	119:5	<b>religion</b>
44:7,16	<b>ramming</b>	60:16	<b>recessed</b>	<b>reference</b>	22:11
62:21	73:9	<b>reasonabi</b>	66:1	94:1	<b>rely</b>
71:8,21	<b>ratherly</b>	<b>lity</b>	<b>recollect</b>	<b>referring</b>	100:22
79:6	122:4	80:5	<b>ion</b>	119:25	101:1
85:24	<b>read</b>	<b>reasonabl</b>	115:13	<b>reflect</b>	<b>relying</b>
87:20	8:7,20,	<b>e</b>	<b>recon</b>	5:14	45:11
88:6 91:5	22,25	18:10	33:2,12,	<b>refresh</b>	<b>remained</b>
95:9,10	9:5,14	19:6	14 35:20	85:13	81:8
99:6	10:5	20:11,17	36:23	115:13,15	<b>Rembert</b>
108:6	31:16	78:14	37:5	<b>refuse</b>	38:13,15,
109:17	50:10	79:17	46:14,24	74:22,24	19 39:25
121:22	74:17	80:13	47:12	78:13	40:21
<b>questions</b>	81:3	81:1,12,	52:15	79:12,13	41:7
6:24 11:1	91:14,19,	14 85:15	93:4,8,	<b>refused</b>	48:19
17:14	21 92:3,6	97:19,20	13,21	74:20	104:21
31:21	96:21	99:8,12	95:21	<b>regarding</b>	<b>Rembert's</b>
122:22	98:17,18	<b>reasonabl</b>	105:9	52:8	40:4
123:4,7	101:12,14	<b>eness</b>	<b>record</b>	115:7	52:23
<b>quick</b>	119:7	82:22	4:8,22	118:11	94:1
119:7	<b>reading</b>	<b>reasons</b>	7:8 20:2	<b>regardles</b>	<b>remember</b>
122:4	38:21	42:15	24:3 28:9	<b>s</b>	68:3
<b>quite</b>	73:7 89:1	118:25	29:15	70:25	84:21
92:2	<b>ready</b>	<b>reassess</b>	34:15	<b>related</b>	115:12
118:23	64:20	74:8	55:11,14	12:3 70:4	119:4
<b>quote</b>	100:6	<b>recall</b>	66:10,13,	<b>relations</b>	122:8
89:3,6	<b>real</b>	19:23	16 81:8	<b>hip</b>	<b>removed</b>
92:24	21:8	32:24	83:9	105:5	39:18
96:23		43:25	117:18,21		<b>repeat</b>
97:1		44:1	123:12		13:19
99:14,19		85:16			
106:22,24					

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

50:5	<b>requiring</b>	<b>right</b>	<b>rights</b>	82:3,10	78:19,25
<b>repetitive</b>	6:9	11:18	22:16,21	113:18,21	80:20
59:17	<b>rescue</b>	12:11	<b>robberies</b>	<b>Russ</b>	82:13
<b>rephrase</b>	71:1	16:17	14:18	11:4,5,6	84:13
35:23	<b>residence</b>	17:24	<b>role</b>	55:16	94:3
71:22	28:17,18,	18:17	34:25	68:1	95:3,22
<b>report</b>	20 30:14	21:17,23,	49:2,10,	80:24	96:11
8:17,18,	37:24	25 22:10	13 51:10	91:13	102:13
20 27:17	56:21,22	26:10,13	<b>roll</b>	92:25	104:5,15
44:12	86:12	29:20	110:4	101:12	106:4,14
50:10	99:19	31:12	<b>rolls</b>	107:18	115:22
81:10,12	102:6	34:15	53:2	113:3	118:1
91:15,21,	120:21	39:1,3	<b>Ronetti</b>	117:23	<b>Sam's</b>
25 93:6	<b>response</b>	40:8 41:3	116:19	118:9,23	47:18,20,
<b>reporter</b>	29:3,11	43:4 45:3	<b>room</b>	122:21,23	24 61:25
4:19 5:4	81:6	47:16	57:15	<b>Russell</b>	<b>same</b>
6:11 9:8	102:16	54:25	58:7 61:1	4:4,9	12:18
32:4	115:5,25	59:1	75:18	5:7,15,24	44:25
34:8,17	<b>responses</b>	61:20	90:10	11:3	60:17
123:13	114:21	63:25	110:5	123:10	85:21
<b>reports</b>	<b>rest</b>	67:4,9	112:5	<b>S</b>	107:5
73:7	65:16	68:10	<b>Roth</b>	<b>safe</b>	<b>sat</b>
<b>reposed</b>	68:20	72:19	76:25	26:3,5,6,	35:15
75:16	94:19	73:23	118:17	11,17	36:12
<b>represent</b>	<b>reticent</b>	76:24	<b>Rothenbur</b>	29:24	45:1
4:20,22	81:8	77:6	<b>g</b>	<b>safely</b>	50:18
5:20	<b>returned</b>	78:18	76:24	59:7	85:4
80:25	116:13	80:18	<b>rounds</b>	89:20	122:23
<b>request</b>	<b>revealed</b>	82:7,25	69:4	<b>safer</b>	<b>Saturday</b>
51:23	113:20	84:19	76:5,13	102:2	32:25
54:21	<b>review</b>	90:6	78:2	<b>safety</b>	<b>saw</b>
115:5	8:16	91:12,25	<b>route</b>	25:24	32:1
116:1	117:15	92:6	49:1	120:22	76:20,21
<b>requested</b>	<b>reviewed</b>	94:17	64:13	<b>said</b>	87:5 99:9
51:16	8:17 10:1	95:1	<b>rule</b>	20:11	103:8,11,
107:14	68:2,5,9	96:14,15	42:18,21,	33:11	22,24
<b>requestin</b>	<b>reviewing</b>	98:4,15,	24 43:2	36:20	104:3
<b>g</b>	8:15	16 99:2,	<b>ruled</b>	38:9	<b>say</b>
51:20,21	<b>rhythm</b>	24	93:4,6,	41:14	18:15
<b>requests</b>	59:23	100:12,22	16,20	50:5,19	24:14,15,
114:25	<b>rifle</b>	102:12	<b>run</b>	52:23	17 25:7
115:9	39:18	107:5	12:21	53:21	32:9
		111:11	58:6	64:11	34:1,4,11
		112:25		77:21	36:7
		113:11			40:17
		115:2,19			41:23,24
		117:11,13			44:12
		123:6			

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

47:3 50:3 53:19,24 54:2 72:11 73:16 75:9,17, 19,24 77:11 78:22,23 79:15 87:10,15, 18 90:7, 17,19 92:4,5 93:8,18 94:16 95:15 96:18 99:24 103:10, 11,19,21 104:19 122:4	15:10,19 17:17 18:21 19:8 21:14 22:25 23:7,10, 11,14,15, 20,23 24:12 30:15 33:5 37:12,15, 16,18,21 38:9,12, 21,22,23, 25 41:20, 23 42:5, 9,11 44:21 49:13 51:9,11 54:7 55:4,24 57:2 70:9 71:1,14, 20 78:15 80:6 81:2 82:16 83:3 86:7 91:2 92:21 94:6 97:1,5 104:9,12 106:3,6, 23 107:5 108:21 109:23 111:1,3,6 118:13	<b>seconds</b> 79:21 81:5 90:12 96:24 97:9,17 98:22,24 99:5  <b>section</b> 13:11,12, 14,17,19 23:8 52:1 92:10 93:20 94:22,23, 24 98:9 108:19 113:19 116:12  <b>see</b> 22:19 58:25 71:24 76:7 93:9 100:13,18 103:9 104:4 120:8 122:3  <b>seeing</b> 28:22 73:7 74:2 103:10  <b>seeking</b> 80:6 81:3  <b>seem</b> 24:1  <b>seems</b> 98:3  <b>seen</b> 6:6 43:12 74:10 76:20 78:24 79:23 82:5,8,10	110:22 115:1 119:10,22 120:8,9 121:2,4, 24  <b>self-explanatory</b> 59:12  <b>sellers</b> 53:3  <b>sensory</b> 89:5  <b>sent</b> 47:8 95:21  <b>sergeant</b> 11:3 12:13 13:23,25 15:24 23:17 29:14 33:7,8 36:3 49:12,17 50:6 65:13 76:21 77:5 103:15 117:2 120:2  <b>sergeant-in-training</b> 33:7  <b>serious</b> 121:21  <b>serve</b> 14:22 15:20 18:21 21:13	30:15 31:10 33:5,12 35:11 44:21 70:9 71:20 78:15 92:20  <b>served</b> 15:10,18 32:20 40:15,18 42:8,9 97:5  <b>service</b> 108:22  <b>serving</b> 17:15,16, 22 19:8 25:3 42:16 43:8,10, 20 62:20, 22 71:1 91:2  <b>set</b> 25:8,9,12 28:21 90:14 97:20  <b>setting</b> 79:3  <b>Seventh</b> 4:12  <b>several</b> 13:8 29:1 43:21 44:13,14 47:9 50:10 119:18  <b>sheet</b> 27:17  <b>shifts</b>	44:17  <b>shoot</b> 76:12 87:10 104:23  <b>shooter</b> 104:21  <b>shooting</b> 6:17 12:6,19 26:14 37:25 38:14 39:12 40:21 41:8 70:5 78:5 87:5 88:10 90:20 104:20, 23,25  <b>short</b> 55:9,16  <b>shot</b> 26:8 72:20 75:20 90:21 110:4 112:3,10, 11,19,23  <b>show</b> 97:25 114:23  <b>showed</b> 48:3  <b>sic</b> 122:4  <b>side</b> 23:17 28:18 65:24 66:2 93:19 101:10
<b>saying</b> 36:18 50:1 79:9 87:25 94:2 96:16 98:12 100:7 106:1  <b>says</b> 79:24 94:6  <b>schedule</b> 10:16  <b>school</b> 113:4,7, 15,21 114:2 118:3,7  <b>screenshots</b> 118:10  <b>search</b> 14:23	<b>said</b> 37:22  <b>second</b> 66:25 90:11 98:1,5 115:16 122:7,8				

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

105:13,25	112:1	<b>SMES</b>	90:23	76:22	<b>spelling</b>
<b>signed</b>	<b>situation</b>	94:12	<b>someone</b>	77:3 80:8	116:19
23:24	21:2,4	98:6,7	18:10	87:11,19	<b>spent</b>
<b>similar</b>	103:5	103:18	121:17	113:15	13:13
41:21	119:14,	107:10	<b>something</b>	115:20,	44:9,19
59:21	19,21	<b>some</b>	21:3	21,24	<b>split</b>
<b>simple</b>	120:13	10:25	46:17	<b>sought</b>	15:8
96:13	<b>situation</b>	11:20,21	58:2,5,8	111:2	<b>spoke</b>
<b>since</b>	<b>al</b>	14:6	59:2 61:1	<b>sound</b>	51:3 52:9
11:11,14	27:19	16:20,24	74:5	66:24	<b>spot</b>
70:2	29:7 63:5	17:12	79:2,3	<b>South</b>	102:20
109:13,15	<b>six</b>	25:18	81:15,20	4:12 62:8	<b>squad</b>
<b>single-</b>	65:14	27:15	93:10	92:20	15:21
<b>story</b>	96:23	28:7 30:4	120:13	<b>space</b>	43:22,23
30:6,8	97:8,17	31:21	<b>sometimes</b>	115:4	<b>squirting</b>
<b>sir</b>	98:22,24	71:16	35:23	<b>speak</b>	74:4
9:9	99:4,5	80:25	53:6	9:9 51:1	<b>stack</b>
<b>sit</b>	<b>size</b>	83:13	80:10	77:7	65:7 86:3
6:22 20:7	80:16	85:4	98:17	<b>specializ</b>	117:25
27:1	82:25	88:16	120:5	<b>ed</b>	<b>standard</b>
30:22	98:23	91:14	<b>somewhere</b>	16:10,15,	18:7,8,9,
31:8	<b>skinny</b>	93:2	50:15	18,23,24	11 19:2,
43:18	121:19	95:18,24,	74:5	<b>specific</b>	6,16
44:24	<b>skip</b>	25 105:4,	<b>son</b>	43:25	62:17,18,
46:3	91:13	10 106:18	110:17	83:8	19,24
48:11	<b>skipping</b>	114:20	<b>soon</b>	84:11	69:17
52:6	87:20	118:10	84:3	88:19	118:1
77:12	<b>sleep</b>	121:20,21	<b>sorry</b>	90:8	<b>standardi</b>
79:18	76:9,12	<b>somebody</b>	7:20 9:8	<b>specifica</b>	<b>zed</b>
87:14	<b>sleeping</b>	24:20	15:14	<b>lly</b>	92:23
88:6	75:11	25:2 44:3	25:12	30:17	94:11
98:21	77:21,24	58:1,13,	30:18	43:23	107:16
99:21	<b>slice</b>	25 60:24	31:6	46:8	108:23
103:10	96:16	61:2 73:9	33:17,21	106:11	<b>standards</b>
106:2,25	<b>slow</b>	74:3,4	34:14,24	<b>specifics</b>	20:9 95:8
109:11,18	34:9 74:8	82:2,10	40:25	106:16	<b>stands</b>
110:6,13,	<b>small</b>	89:18	46:12	<b>speech</b>	44:8
25 111:17	52:11	90:13	47:3,5,6,	22:11	<b>start</b>
113:6	93:9	91:7	23 50:1	<b>speed</b>	12:24
118:4	<b>SME</b>	104:23	51:13	99:16	13:1
122:18	97:23	108:7	52:13	101:9	28:24
<b>sits</b>	99:23	114:11	61:21	<b>spell</b>	29:10
30:25	108:7	120:23	62:10	5:22	31:15
<b>sitting</b>		121:4,24	63:6,9		37:4
36:6		122:14	68:3 71:8		
		<b>somebody'</b>	73:19		
		<b>s</b>			

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

<b>started</b> 13:5 62:7 64:9 76:5 78:3	93:23,24	<b>street-</b> <b>level</b> 14:19	95:23 96:6,7 105:10 114:20 121:20	78:10 97:10 98:24	107:7
<b>starting</b> 64:20	<b>stepmothe</b> <b>r</b> 40:4 60:11 80:20 94:2	<b>strong</b> 73:11	<b>stun</b> 55:7 56:6,10, 18,20,21 57:1,12, 25 58:10, 11,16 59:9 60:3,17, 20 61:13 89:5,7,8, 9,16,17 107:12	<b>sufficien</b> <b>tly</b> 30:13 52:17	<b>surroundi</b> <b>ng</b> 86:8
<b>startled</b> 76:11	<b>stick</b> 55:7 56:6,10, 18,20,22 57:1,12, 25 58:10, 11,16 59:9 60:4,17, 20 61:13 89:17 107:12	<b>structure</b> 15:22 20:23 24:7,10, 24 25:20 26:1,2,4 28:12,20 29:19,24 30:14 36:24 37:8 39:25 40:20 42:20 45:22,24 47:12 48:14 52:17 57:3 58:7 80:16 82:25 86:4 97:12	<b>stunned</b> 89:14 90:22 91:7	<b>Sunday</b> 32:21,25 <b>supersede</b> <b>s</b> 19:3 <b>supervisi</b> <b>on</b> 109:6 <b>superviso</b> <b>r</b> 10:12 15:23 23:13	<b>surveilla</b> <b>nce</b> 43:13,14, 19,22,24 44:2,5 45:5
<b>state</b> 4:21 5:22 7:7 17:8, 15,18,21, 25 18:7, 11 19:3, 15 29:15	<b>still</b> 12:15 24:2 28:7 36:12,19 44:7 55:18,19 85:21 112:4,6,9	<b>structure</b> <b>s</b> 120:7	<b>style</b> 39:18 <b>subject</b> 92:13 99:17	<b>supposed</b> 39:23 43:2 <b>sure</b> 35:24 42:22 46:16 63:21 67:15 72:12 94:4 98:19 119:7	<b>surveill</b> <b>ng</b> 44:10
<b>statement</b> 8:7,12,15 9:5,13, 14,15 10:4 21:8 31:16 34:16 38:7 63:21 88:24,25 89:2,3 93:25 94:19 101:4,13, 15,21,22 102:13 104:6 107:22 116:13 117:24 119:10 120:1	<b>stole</b> 116:17 <b>stop</b> 22:22 66:6 67:8 89:19,21 <b>stopped</b> 67:4 <b>stops</b> 52:20 54:12 80:23 <b>straight</b> 87:13 <b>Street</b> 4:13	<b>stucco</b> 119:2,12 <b>stuck</b> 99:17 <b>studies</b> 12:1 <b>studs</b> 121:9 <b>stuff</b> 14:19 35:24 37:1 43:7 62:13 83:2,18 85:21	<b>submit</b> 96:25 <b>subsequen</b> <b>t</b> 83:14,16 <b>success</b> 111:19 112:1,8 <b>successfu</b> <b>l</b> 111:24 <b>such</b> 22:15 <b>sufficien</b> <b>t</b> 28:19 75:5	<b>surprise</b> 99:16 101:9 <b>surprised</b> 9:20 <b>surround</b> 28:3,5, 10,11,12 29:23 30:2 83:17	<b>suspect</b> 25:4 37:24 53:10 57:6 60:10 99:11 102:7 <b>suspected</b> 81:6 <b>suspects</b> 38:2,6 39:11 45:15 46:24 47:3 54:13 110:8,12 111:14 <b>SWAT</b> 12:13,15 14:2,22 16:14 19:17,21 23:8,16 31:1 32:1 36:3 50:11 51:17 56:24 63:8,13, 15,16,19, 23 64:22
<b>statement</b> <b>s</b> 102:14 <b>States</b> 4:17 <b>stayed</b> 94:3 <b>staying</b> 92:17					

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

83:11	107:14,	24	<b>tell</b>	<b>testify</b>	78:17
92:10,11	15,16	<b>talking</b>	7:12	5:9	79:2,23
93:20	108:23	8:11 17:7	17:21	<b>testimony</b>	81:8,9,
105:13	<b>take</b>	18:13	18:25	6:25 7:5	21,25
108:22	20:21	28:2 47:4	19:13	77:12	84:22
113:4,7,	24:23	55:23	25:15	<b>text</b>	86:4 87:6
10,15,21	25:21	119:4	39:2 44:1	118:10	89:14
114:14,16	27:22	<b>target</b>	59:11	<b>than</b>	91:23
118:3,7	29:20	66:4	66:19	8:4,14	93:13
119:18	30:1 43:4	103:13,20	68:24,25	10:3	94:2,6,12
<b>SWAT's</b>	45:18	<b>targets</b>	74:21	16:14	95:8,9,10
92:20	55:9 59:7	48:15	86:25	20:15	96:1,2,8
<b>swear</b>	67:12,17,	<b>team</b>	91:24	79:9	98:9
5:4	19,21,22,	12:14	104:15,17	104:15	99:2,23
<b>sworn</b>	25 72:5	14:2	112:2	110:10	100:1
5:9	89:20	19:21	118:21	112:13	102:18
	104:22	33:8	119:20	121:3,5	103:19,20
	117:12	34:5,6,7,	121:13	<b>Thank</b>	104:10,22
<b>T</b>	121:6	12,18,23	122:1	7:11 67:9	105:16
	<b>taken</b>	35:7 48:2	<b>telling</b>	70:15,17	108:6
<b>tactic</b>	55:12	49:11,13	81:20	117:12	111:25
15:15,16	66:14	50:18	100:17	<b>that's</b>	112:8,20,
25:14,18,	117:19	59:4	101:20	7:19 11:4	21 114:8
19,25	123:10	60:23	<b>temporari</b>	14:13	115:8,20,
29:18	<b>takes</b>	63:15	<b>ly</b>	17:10	21 116:12
30:21	114:2	65:16	89:5,19	20:3	120:5,18,
63:1,17,	<b>taking</b>	68:20	90:1,3,	21:3,4	22,23,24
19,22	25:22,23	72:4 85:2	13,14	22:3,6,12	<b>them</b>
85:21	49:1	88:3	<b>ten</b>	23:2	21:14
95:5	51:10	95:21	45:2	24:21	23:16
101:23	76:5	103:15	117:7,8,9	25:1,2	25:22
102:1,2,9	<b>talk</b>	118:3	<b>term</b>	28:23,25	28:15
<b>tactical</b>	34:9	<b>teammates</b>	99:3	29:7	29:13
37:8 43:5	72:23	112:6	<b>terms</b>	40:23	39:15
49:18	104:16	<b>teams</b>	34:4,25	42:5,8,9	40:7,19
62:6,9,11	<b>talked</b>	43:14	42:16	48:2	47:6 51:1
64:21	16:21	<b>Tec</b>	45:21	53:1,4,5	54:5 58:4
73:16,18,	33:11	56:6	63:12	61:3,10	59:7
24 74:6,	51:3 63:6	59:22	73:19	62:20	60:12,24,
12 84:2	79:16	<b>technique</b>	80:5	63:7,18	25 68:16,
100:23	80:1,4	73:10,12,	93:15	64:1	21 69:4
102:20	81:11	14	104:6	66:21	80:23
103:1,8	85:22	<b>telephone</b>	<b>testified</b>	70:14	88:16
107:15	93:1	29:4	5:10	72:9	89:19,20,
<b>tactics</b>	99:20		87:22	74:1,7	21,25
71:6	117:23		97:5	75:14	91:18
92:23	118:9,23,			76:9,11	98:20
94:11					100:22
					103:17

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

114:24	106:21	89:4,9	64:10	20 42:13,	9:1 15:20
115:5,20,	107:9	90:4	68:1	14,17	24:8
22 116:6	108:19	115:8,12	72:15	43:3,9,	27:22
117:6,8	116:9,24	<b>they've</b>	74:11,14	19,20	30:12
118:15,	119:13	16:21	75:4,21	49:16	46:1 54:1
16,19	<b>therapist</b>	80:21,22	76:1,20,	50:7,12,	56:4 59:5
120:15	69:12	<b>thick</b>	21 77:13	20 55:3,	60:7,11,
122:2,3	<b>there's</b>	91:25	78:6,10,	24 56:9	12 69:4
<b>themselves</b>	14:16	<b>thing</b>	21 79:20	57:2	72:5 78:2
<b>s</b>	18:13,22	16:3	80:1	60:16	93:7,16
20:23	20:24	89:23	83:11	61:13	94:14
<b>then</b>	22:3 24:7	96:13	85:3,9	62:22	109:4
13:2,7,	25:18	98:4	86:15	63:10,22	112:4
13,16,24	30:4,10	104:5	90:22	69:11	115:19
14:1	42:25	113:1,22	94:18	70:5	116:3
18:5,6	43:1,6	<b>things</b>	97:4	71:15	117:5,12
19:5	53:1,18,	27:15	100:9	73:19	118:14
23:16,23	22 59:1	42:18	103:1	76:10	120:15,20
24:19	60:23	43:2 46:1	104:17	77:6 79:7	<b>though</b>
29:9,10	64:19	51:16	105:18,20	80:8	32:12
32:17	67:18	68:2	108:2,5,	82:12	44:8 68:3
33:12	68:14	71:10,19,	10 113:1	83:3,12	91:6
35:15	72:9	24 72:11	114:19	84:3	101:4
37:3,5,6	75:21	74:9 82:5	116:20,21	85:25	110:24
44:24,25	76:6	93:1,7	118:19	87:23	<b>thought</b>
48:18,24	78:6,7	95:18,24,	119:25	89:2	39:24
49:4,7,19	79:20,24	25 98:18	122:21	90:10,16,	41:17
50:4	80:25	101:18	<b>this</b>	17 94:10,	42:6 51:1
51:16	89:10	102:18	4:8,13	21 95:4,	54:7 57:5
56:7	95:18,25	104:7	5:14,21	17,22	76:3
57:4,21	96:6	105:4	10:15,19	96:2,12,	86:22
58:25	97:19	117:23	12:18	13 97:3,	87:25
59:11	100:3	<b>think</b>	16:21	17	101:17,19
61:23	102:5	8:23	17:15,17,	101:14,19	104:2,7,8
62:2	103:12	16:22	22 19:8	102:11,23	108:3,14,
64:5,8	104:24	18:18	20:16	103:5	17,18
65:1,9,12	105:6	19:20,23	23:3 24:1	104:8,11,	109:25
66:6	106:18	20:7,8	26:4,10,	16 105:11	110:2
69:5,7	110:16	22:2,3,6,	16 28:6	106:3	118:20,22
74:9 79:4	111:23	12 23:2	29:14	107:5	<b>threat</b>
84:17,20	114:1	25:8 27:5	30:17,23,	109:13,15	92:13
85:10	115:23,24	37:19	24 31:4,	111:1,18	<b>three</b>
87:2	120:6	41:12	10 33:2	112:24	65:11
89:20	<b>these</b>	44:14	35:11	113:15,	99:13
93:22	14:24	47:1 50:9	36:2,7,	16,19	115:10,25
94:9	20:8	53:17	18,20	115:13	116:1
99:13	39:13,17	57:1	39:19	118:12	<b>threshold</b>
100:20,21	53:6,16		40:8,10	123:9	
102:20			41:1,2,4,	<b>those</b>	



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

24:10	34:9,16	116:14	20,21,22,	10,12,22	12,23
<b>through</b>	36:2 37:9	<b>times</b>	24 24:6,	53:1,8,	83:3,5,8
8:21 9:18	41:14	7:22,23	22 25:19,	13,18	84:5,8,9
12:21	44:9	26:9,12	20,21	54:4,11,	85:5,11,
23:1	46:13	35:23	26:1,2	19,21,23	13 86:5,
27:15	47:1 52:2	50:10	27:22	55:3,5,6,	11 87:3,
29:9	56:21,23	56:9	28:8,25	17,24	10,11,22,
47:25	62:15	59:23	29:4,15,	56:1,10,	23 88:2,
48:10,12	63:13,18	72:20	19,20,23,	12,18,22	7,16,18,
51:19	64:17	75:20	24 30:15,	57:1,12	19,23,24
52:6,24	65:25	90:21	23,25	58:2,5,6,	89:7,13,
55:2 56:2	69:17	99:18	31:3,13,	8,10,14,	18,19,21,
58:16,22	70:19	112:3,11	14,19,20	15,21,24	22,23
59:13	71:25	<b>timing</b>	32:4,9,20	59:2,3,6,	90:3,4,
61:13,21,	73:10	113:22	33:5,11,	13,21	13,16,17,
22,23	75:5,7,23	114:4	12,13,19,	60:1,3,	23 91:1,
64:25	77:14	<b>title</b>	23 34:9,	15,16,22,	13,14,17,
65:4	78:2,15	59:12	21,23	24 61:2,	19 92:1,
70:23	79:7,17,	<b>to</b>	35:9,11,	10 63:7,	4,5,6,7,
72:18,25	25 80:5,	5:9 6:9,	20,23,24	10,19,20,	12,16,20,
73:6	13 81:2,	16,23	36:7,8,	23 64:6,	25 93:3
76:2,4	13,15	7:4,13,	13,15,18,	14,17,20,	94:14,24
85:4	82:23	16,17,18,	20 37:6,	24 65:4,	95:2,5,13
86:18	84:9,12	21 8:1,5,	7,20,21,	14,19,23	96:12,13,
90:24	85:15	8 9:4,6,9	25 39:5,	66:2,10,	18,21,24,
91:8 92:1	87:23	10:18,25	7,12,15,	11 67:12,	25 97:9,
107:12	88:9	11:15	19 40:11,	19,21,25	10,25
109:5	90:8,14	12:3,13,	13,16,23,	68:5,11,	98:10,13,
113:1,14	94:23	17,22,23,	24 41:1,	19 69:2,	14,17,18,
119:1,11	96:24,25	24,25	2,5,15,	3,6,7,14	19,24,25
120:10	97:4,9,	13:2,8,	16,21	70:4,20,	99:1,16,
121:5,8,	10,19,20,	11,12,14,	42:8,18,	25 71:2,	18 100:6,
16,18,20,	21 98:24	17,18,19,	24 43:2,	3,12,22	23 101:1,
24,25	99:9	23,25	8,10,11,	72:1,5,	3,8
<b>Thursday</b>	100:2	14:2,4,	20 44:5,	13,16,18,	102:3,9,
4:2	101:7	13,17,21	11,19,21,	21 73:17	14,23,24
<b>time</b>	102:25	15:6,8	23 45:3,	74:7,12,	103:1,3,
4:10 5:14	103:13,	17:5,6,	5,7,9,17,	17,22	10,16,17
7:24	16,19,20	12,13,25	19,23	75:5,6	104:16,18
13:24,25	104:2,3,4	18:7,10,	46:15,17,	77:7,8,9,	105:14,
15:17,24	108:4,18	11,21	19,21	10,11	18,20,24
18:10	109:2,22	19:20,21,	47:6,8,	78:5,12,	106:4,10,
19:7	113:15,	23 20:1,	14,16	13,15,20,	22 107:6,
20:12,14,	16,18,20	13,21	48:9,14	21,22,25	19 108:3,
17 23:18	115:4	21:6,12,	49:1,5,8	79:3,5,6,	12 109:1,
26:24	120:3	13,17,18	50:3,4,5,	10,11,12	9,12
27:8,10	121:3	22:15,22	19,23	80:2,9,	111:1,5
33:1,8	123:3,12	23:11,15,	51:3,8,	24,25	112:2,7,
<b>timeline</b>			11,16,23,	81:5	18,25
			24 52:5,	82:3,10,	113:2,3,



Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

9,20,23, 24 114:5, 16,18,19, 20,24 115:2,4, 5,8,13,14 116:1,11, 13,17,20 117:9,14, 15 118:16, 19,25 119:25 120:4,10, 14,17,19, 20 121:9, 17 122:3, 5,6,25 123:3	<b>today's</b> 4:9 6:6 7:13 8:1, 6 9:4 68:6 114:23 <b>together</b> 35:6 36:8,13, 19,21 37:5 48:5 <b>toilet</b> 81:17 82:4 <b>told</b> 40:4 43:12,17 45:4 <b>too</b> 39:21 49:7 65:18 68:25 77:5 86:14 96:6 98:1 102:7 114:24 <b>took</b> 55:16,18 69:3 73:4 122:1 <b>tools</b> 107:15 <b>totality</b> 80:15 82:13,21 98:22 <b>totally</b> 20:5 21:3 67:17 <b>touch</b> 67:3	<b>tournique</b> <b>t</b> 62:13 <b>towards</b> 59:6 62:8 64:9 <b>Town</b> 47:18,20, 24 61:25 <b>townhouse</b> 120:7 <b>toy</b> 93:9 <b>toys</b> 93:11 <b>tragic</b> 71:25 72:8 <b>train</b> 72:12,16 <b>trained</b> 27:14 <b>trainer</b> 49:23 <b>training</b> 19:17,22 20:2 36:12 49:13,20, 21 52:24 53:21 70:21 72:16 79:19 83:4,8,9, 10,11,13, 14,16 84:4 85:24 86:1,4 89:10 92:23 94:10 107:16 108:23	113:19 <b>transcrip</b> <b>t</b> 9:16,19 10:5 94:20 123:14 <b>transcrip</b> <b>ts</b> 10:6 <b>transfer</b> 114:6,7 <b>transferr</b> <b>ed</b> 114:5 <b>transpire</b> <b>d</b> 97:18 <b>treatment</b> 69:11,12 <b>trial</b> 77:7,10 104:16 <b>tricycle</b> 93:10 <b>tried</b> 72:21 <b>Trust</b> 98:13 <b>trusted</b> 103:14 <b>trusting</b> 103:17 <b>truth</b> 5:9 <b>truthful</b> 6:24 7:4 <b>try</b> 29:4 33:19 120:19	<b>trying</b> 19:20,23 29:23 30:15 36:15 58:1,6,7 87:10,11 88:2 89:22,23 98:13 102:13 116:17 120:14 <b>tunnel</b> 121:8,16, 20,24 <b>two</b> 7:23 29:13 39:11,14 54:1,13 60:7,11 62:15 63:3 65:10 66:23 69:19 84:13 90:11 110:8,11 111:13 115:10, 22,25 116:1,5 117:5 120:6 <b>two-story</b> 30:7,9 <b>type</b> 14:13 20:19 27:20 30:23,24 31:10 42:17 43:3 63:1,3 68:15	81:13 89:23 104:11 106:3,6 <b>types</b> 46:1 120:7 <hr/> <b>U</b> <hr/> <b>U.S.</b> 83:5 <b>Uh-huh</b> 17:19 22:1 23:5 61:9 99:7 <b>ultimatel</b> <b>y</b> 19:1 <b>unartfull</b> <b>y</b> 71:9 <b>unaware</b> 73:21 <b>under</b> 7:2 15:23 18:2,7 55:9,19 83:5 96:23 97:19 <b>understan</b> <b>d</b> 6:15,23 21:16,19 35:24 37:11 41:1 46:23 53:13,25 55:19 63:21 77:8 80:9 90:24 98:12,16,
---	---	---	---	---	--

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

19 100:7, 8 106:5 107:18 110:7	<b>unknown</b> 70:20 72:13 92:16	103:7,17, 20 104:14 117:14 119:19	<b>usually</b> 14:20 29:4 46:21 53:1,2 121:11	<b>verbiage</b> 23:10 47:7 92:11	55:10,13 66:12,15 117:17,20 123:8
<b>understan ding</b> 19:1,6 21:10 37:14,15 39:2,10 49:6 58:9 79:18 85:11 89:7 91:8 96:11 106:7 107:1 110:10	<b>unknowns</b> 46:4 92:14 93:2	<b>upon</b> 26:10,12	<b>utilize</b> 55:6 59:2,3 63:3 102:10	<b>versus</b> 4:14 5:16 25:4	<b>videos</b> 76:16,19
<b>unfortuna tely</b> 68:14 72:7	<b>unless</b> 79:2 118:6	<b>us</b> 17:12 28:23 41:16 57:18,19, 21 69:5 72:20,21 73:8 75:19,20 78:5 90:20,21 102:2 112:10, 11,19,23, 24	<b>utilized</b> 24:25 26:1 30:20 58:21 60:22 106:22 107:2	<b>very</b> 15:3 25:2 29:13 31:18 69:9 86:6 90:1,3 91:20 95:10 108:6 114:3,14 120:18,19	<b>videotape d</b> 4:8
<b>unit</b> 13:9,10 14:11,12, 20 15:19 26:16,17 38:1,6,20 39:22 43:19 44:10 46:5,7 50:20 54:9 104:20 111:3,14, 15 114:5 119:3 122:7	<b>until</b> 24:9 63:23 77:7 118:3	<b>use</b> 26:22 27:1,2 39:5 45:19 55:24 56:17 60:3,16 95:5,15 96:13 107:11,12 108:22 118:25	<b>utilizing</b> 99:16	<b>vest</b> 62:12	<b>view</b> 53:14,15 100:17
<b>United</b> 4:16	<b>up</b> 9:9 13:2 15:8 20:21 23:22 24:23 25:22,23 27:22 28:8 30:1,3 32:5 35:11,18, 21 40:25 46:15 48:3,4,5 49:2 51:8,18 53:13 57:19,23 58:22 60:23 62:3 63:7 66:1,11 69:1 72:14,22 75:5,6,9 79:3 87:13,23 97:14,22 98:1 100:19 102:4	<b>used</b> 13:19 24:18,20 30:23 56:5,7 57:13 61:10,16 73:13 85:18,20	<b>v</b>	<b>via</b> 7:9 28:24	<b>viewpoint</b> 95:17 99:24
<b>units</b> 14:24 53:16 81:23 97:7		<b>using</b> 63:1 112:14	<b>valley</b> 11:11	<b>viewpoint /opinion</b> 107:25	<b>viewpoint s</b> 95:14,16
			<b>variety</b> 42:15 73:20	<b>vice</b> 13:11	<b>violate</b> 22:16
			<b>Vegas</b> 4:1,13,14 5:17 11:9 121:10	<b>vicious</b> 43:6	<b>violating</b> 22:20
			<b>vehicle</b> 39:19 44:5	<b>victim</b> 104:24	<b>violation</b> 117:1
			<b>vehicles</b> 28:14	<b>video</b> 4:10 59:19 66:7,11 67:2,10 68:5,11 69:2 73:2 74:10,22 100:9,11 123:11	<b>violator</b> 13:18
			<b>verbalize</b> 86:6	<b>video- recorded</b> 123:9	<b>violators</b> 13:20,25 120:1
			<b>verbalizi ng</b> 86:3	<b>videograp her</b> 4:7,19 5:3	<b>violence</b> 20:20 40:19 52:18 53:9 83:1 105:8 120:24
					<b>violent</b> 14:18 20:20 24:21

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

25:1,2	7:16,17	21:14	118:13	27:1	78:3,14
27:21	12:24,25	22:24,25	<b>warrant's</b>	28:11,19	79:16,18
29:25	17:13	23:1,7,	36:7	29:4,5,8,	80:1,7
41:25	21:8 24:3	11,14,15,	<b>warrants</b>	9,10,11,	83:12
53:9	29:14	20,23	14:23	24 30:20,	85:2,20
57:10	33:23	24:5,6,11	15:10,19	22 31:8	87:14
58:2 60:8	35:24	26:23,25	24:12,18,	33:4,5,	88:6,11
83:1	39:5	27:3	20 32:2	11,12	91:1,2,3,
89:23	40:11	30:16,24	70:9	35:21	19 93:1
105:5	41:1	31:10,24,	71:14,20	37:6,22	94:22
<b>voice</b>	45:23	25 32:10,	97:6	38:3	95:4,5,
32:5	46:21	19 33:5,	<b>watch</b>	39:13,24	17,20,22
<b>vulnerabl</b>	53:13	10,12	68:11	40:17,24	97:18
<b>e</b>	55:17	35:12	69:2	41:11,25	98:21
92:18	63:20	37:12,15,	<b>watched</b>	42:5,6,8,	99:4,20,
93:5,15	66:10	16,18,21	74:21	9 43:10,	21 101:24
	67:12,25	38:9,12,	76:15,16,	18 44:24	103:21,
	70:20	21,23,25	18,19	46:3	22,23
<b>W</b>	71:12,22	39:6	100:13	48:3,4,5,	105:1,15
	74:17	40:16,18,	<b>watching</b>	6,11,14,	106:2,25
<b>wake</b>	77:8,11	22 41:10,	73:2	25 49:1	109:11,18
75:5,9	79:6	11,13,20,	75:25	52:5,10,	110:6,13,
<b>walk</b>	80:2,9	21,24	<b>Wattsel</b>	11,13,14,	25 111:17
47:25	92:25	42:6,9,	38:15	15,16	112:13
48:10,12	95:5	11,17	52:22	53:9	113:2,3,
51:19	98:19	43:9,11,	109:19	54:11	6,21
52:6 55:2	104:18	20 44:22	<b>way</b>	55:9,10,	114:24
56:2	107:19	49:13	17:8,16	13,16,18,	116:25
58:16	115:13	51:9,12	23:21	22 56:1,	117:14,
59:13	120:4	54:7	25:5 39:3	5,7,17	17,20
61:21,23	<b>wanted</b>	55:4,25	40:15	57:5,6,7,	118:4
64:25	21:8	57:2	44:25	13,14,15,	119:13,22
65:4 75:6	63:10	62:23	71:15	16,19,22	120:8,9
76:2	113:2	71:1	86:7	60:7,10	123:11
113:13	114:15,	78:15	102:5	61:21	<b>we'd</b>
<b>walk-by</b>	16,20	80:6 81:2	<b>ways</b>	62:3,7	30:25
47:2,11	120:3	82:16	73:21	63:6,9	42:7
<b>wall</b>	122:6,25	83:3 86:7	87:2	64:9,13,	<b>we'll</b>
46:25	<b>wants</b>	91:3	<b>we</b>	22 65:2,	10:23
47:10	121:17	92:21	4:7,12,20	7,9 66:1,	28:14,16,
120:10	<b>Warner</b>	94:7	6:12,22	6,10,12,	23 29:1,3
121:5,25	33:6,11	104:9,12,	13:1 17:8	15 67:17	31:15,21
122:15	51:1	13 106:3,	18:15	68:22	66:7
<b>walls</b>	65:11	6,8,23	20:7	69:3	95:15
121:13	<b>warrant</b>	107:3,6	26:8,12	72:19,22	<b>we're</b>
<b>want</b>	17:17,23	108:21		73:25	6:16
	18:21	109:23		74:7,8,14	28:21
	19:8	111:1,3,		75:2,15,	29:3,19,
		6,18		19 77:7,	
		112:15		12,23	

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

23 31:12, 14 36:8, 20 41:15 50:19 57:6,9 63:1 96:12 99:10 102:7 103:16 105:6 110:19 112:8 120:25	39:21 44:8 46:9 49:3,7 51:7 53:14,20 54:17 56:9 57:3,24 71:11 72:24 75:12 77:5 86:9,14 88:15 93:18 94:12 98:4,10 99:23 104:14 106:20 110:19	9:3 11:24,25 14:10 15:4,18 16:12 17:6,22, 25 18:6 19:14 20:18 21:10 22:6,24 25:13,15 27:13,16, 17,25 29:2,15 32:17,19 34:21,22, 25 35:1,8 36:16 37:12,14 38:4 40:11,24 42:6 43:10,11, 17,20 45:10,12, 18 47:19 48:1,10, 12 49:3, 5,8,10,19 50:5 51:4,6 53:5 54:18,19 55:2,3 56:2,3 57:22 58:16 59:25 60:2 61:12,16, 24 62:2, 9,11,14, 18,23 63:1,2,8 64:1,8,25 65:5 69:1 70:7,8,10 71:6 72:2,17	73:5,13, 17 74:22 75:24 77:8,9,10 79:17 80:5,12 81:2,13 83:4,14, 22 85:10, 11,15,24 86:22 87:5,22 89:7,8,19 90:8 93:2,13 94:6 95:4 96:11 97:18 98:12 99:8 100:7 101:20,21 102:15,20 103:9,11 104:2,3, 17 106:11,14 107:23 108:4,13, 14,17,18 109:1,2,9 111:7,10 113:20,23 120:16 122:11	121:23 <b>whatever</b> 30:15 39:4 42:19 58:2 59:1 69:18 71:2 74:3 89:22 <b>whatnot</b> 116:17 <b>wheel</b> 93:10 <b>when</b> 12:2,18 15:18 24:18 25:3 26:15 31:23 32:17,20, 21 34:4, 11 42:16 46:5 47:3 50:12 54:20 63:19 64:17,19 70:18 71:2 72:18 73:16 75:18 85:18 88:1 92:12 99:9 101:10 102:15 104:6 106:22 107:2,3, 11 110:4 113:11 114:8 116:12 117:2 120:1,22	<b>where</b> 11:21 13:13 14:2 21:4 23:3 25:4 29:19 30:9,10 35:8 36:25 37:1 39:13,20 43:21 44:4 46:7 47:21 48:2,25 50:15 57:20 63:2 65:19 74:7 78:1 81:23 94:2,4,9, 18 95:4 97:13,23 116:7 119:1 120:6,9 <b>whereupon</b> 5:6 55:12 66:14 117:19 123:16 <b>wherever</b> 24:24 <b>whether</b> 30:13 43:5 48:21 51:25 58:6 60:23 93:19 104:24 107:19 111:8 112:14 <b>which</b> 8:23
<b>we've</b> 21:7 31:13 35:22 55:8 59:19 85:21 122:23	<b>went</b> 8:21 13:17,18, 23,25 32:21 33:4 42:14 44:4,13, 14 45:1 46:25 47:10 48:14,21 55:18 61:21 69:14 76:4 83:16,21, 24 84:5, 12,20 90:20 99:4 113:10				
<b>weapon</b> 52:20 104:25 105:7 121:1					
<b>weapons</b> 39:15 102:5					
<b>wear</b> 62:23					
<b>weeks</b> 36:4					
<b>weird</b> 41:12					
<b>well</b> 8:9 11:10 12:24 17:10 18:24 19:16 21:25 22:8,25 24:13 29:5 31:3	<b>west- facing</b> 107:12 <b>what</b> 7:17 8:5		<b>what's</b> 6:3 11:18 12:11 14:10 21:22 24:4 59:14,18 61:7 62:19 74:8 84:1 90:2 94:9 96:7 97:20 111:24		

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

10:21	<b>whom</b>	23,25 8:4	105:4	15:4	47:22,23
13:19	4:22 9:10	9:23	108:15	32:22	49:23
17:8	<b>whomever</b>	10:1,9	112:5	33:4 69:7	51:13,22
18:11,12	98:25	13:4	116:21	71:2	56:15
28:14	<b>why</b>	20:23,25	117:3	72:12	58:11,12
55:7	13:1	22:14	120:13,23	84:6,16,	60:19
56:8,23	41:12,16	23:3	122:11	17	63:25
57:16,17	42:8	27:23	<b>within</b>	<b>worked</b>	64:3
65:9	47:13	28:13	14:15	32:3	66:19
76:19	55:9	29:4	17:18	53:16	67:16
104:4,21	56:18,25	30:2,5,11	31:17	81:25	68:9,13,
115:6,8	64:15	31:10,15	75:6	113:19	17,22
<b>while</b>	66:6	32:18	84:10,13,	<b>working</b>	70:16
19:22	85:20	33:5	18 92:22	10:15	71:23
43:13	108:14	35:1,2,3,	94:11,22,	35:10	73:2,3,22
44:2	113:14	5,7,10,	24 95:7	97:3	74:14,16,
46:23	114:6	11,18,21	96:17	<b>worse</b>	25 75:10,
47:11	117:14	36:6,13	107:16	10:22	19 78:25
73:4	<b>Williams</b>	37:10,11	108:22	<b>wrap</b>	82:2
74:23	6:17	38:3	111:14	46:11,12	85:3,4
75:1 79:8	74:22	39:17	<b>without</b>	73:8	91:10,11,
88:13	75:5	42:17	81:5 95:7	96:5,9	24 92:3
89:23	77:13	43:16	102:3	101:25	98:15
92:10	79:9	48:8,25	<b>witness</b>	102:8,21	99:12
100:2	86:16	50:18	5:4,8	105:10	100:16
116:10	88:8	51:3	9:11	117:14	101:16
<b>who</b>	90:17	52:7,9,	26:20	<b>write</b>	103:12,19
42:6	109:12,14	11,20,21	32:6	98:18	105:10,21
48:18	110:7,13,	54:5,12	66:17	<b>wrong</b>	108:9,12
49:3 51:2	20,21	57:18	67:3,19,	25:7 39:3	109:24
52:2,13	<b>willing</b>	60:1,2	23 70:16	91:25	110:2,5,
61:6	20:21	62:14,16	76:25	<b>y</b>	15,18
65:13	<b>window</b>	65:8	77:17	<b>yeah</b>	111:16
66:3	44:6	69:12	86:21	9:17	112:22,25
92:17	45:25	70:21	111:23	10:20	113:11
93:22,24	57:13,18	72:25	<b>won't</b>	14:9	116:5
94:13	58:22	73:5	91:3	18:4,19	117:5
112:6	61:11,13,	74:15	<b>word</b>	21:20	118:22
122:13,19	17 74:4	81:19	39:4	32:11	121:5
<b>whoever</b>	75:8	83:5,10	95:15	33:18	<b>years</b>
15:24	107:13	90:23	<b>worded</b>	35:15	13:8,13
58:23	<b>wish</b>	92:15	16:1	38:21	14:25
74:2	112:22	94:18	<b>words</b>	45:17	15:4
97:22	<b>with</b>	96:19	87:21	46:17	66:23
<b>whole</b>	6:11	97:21,22	<b>work</b>		82:1
48:2 85:2	7:14,22,	99:21	14:15		117:8,9
96:13		100:4			<b>yes</b>
		101:11,23			5:24 6:2,
		102:6,20			8,18
		104:21,25			

Russell Backman

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

8:13,17,	107:4,8
21,25	110:9
10:14,17	113:8
12:16,20	114:12
14:25	115:1
16:4	119:24
19:9,12	121:4
20:10	122:10
21:21	123:15
22:18,23	<b>yes-or-no</b>
23:5	26:13
27:9,11	<b>Yikes</b>
28:4	67:9
30:20	<b>yourself</b>
31:5,7	<b>s</b>
33:4	22:15
34:6,13,	
20 35:21	
36:5	
37:13	
42:12	
46:13,20	
47:20	
49:25	
50:8,25	
51:17,23	
54:22	
55:1,21	
56:5	
58:13	
67:7 68:7	
69:14,23	
71:23	
73:10,22	
74:15	
76:25	
77:3	
79:14	
81:25	
82:6,8	
83:2	
84:23	
88:2,4,5	
91:23	
92:2,5	
94:25	
95:25	
102:8	
103:4,6	
104:10	